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Playing the long game: How civil society can lead change

Olena Pavlenko

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Cover photo credit: Hervé Cortinat / OECD, 2019 EITI Global Conference

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The backstory

The pace of reform in any country depends on people: on those in elected office, on how the country is governed, and on whether its government is prepared to institute changes quickly. There are countries where the government is motivated to carry out reforms and drives the country forward. But this is not always the case, and sometimes it's not scaled up enough to achieve real change. Moreover, if some of the pieces in the reform "puzzle" go missing, the reform ends up incomplete and voters become disenchanted with those same politicians who not so long ago enjoyed great popular support.

The second case describes Ukraine pretty well: reforms drag along and results are not what voters would like to see. Since the collapse of the Soviet Union in August 1991, the country has undergone two revolutions, in 2004 and 2014, where the main demands were to fight corruption, to integrate with Europe, to make government more transparent and accountable, and to reject any integration with Russia. During each revolution on the country's main square, the Maidan, more than a million Ukrainians came out, set up camps in the dead of winter, and insisted that those in power be replaced by those who were capable of bringing qualitative changes to their lives and their country.

During the second revolution, the Revolution of Dignity in 2014, more than 100 protesters were killed, but this did not stop the protests. Still, after each revolution, new people came to power who promised to fulfill the demands of Ukrainian voters, but the more time passed after the revolution, the slower the reforms went, the more opaque the government became, and the angrier voters grew again.

In the meantime, Ukraine's extractive industries, especially natural gas extraction, continued to operate before 2014 as one of the most corrupt sectors in the country. Over many years, the government kept avoiding transparent procedures and issuing licenses to companies that were linked to the country's leadership directly or via various oligarchs. The absence of transparent and fair competition led to a situation where the country's natural reserves were being depleted, nobody was investing into the development of new fields, and various tax-evading schemes meant that the state failed to collect millions of dollars.

Around 2009, work began to promote the Extractive Industries Transparency Initiative or EITI as the global standard for promoting open and accountable management of extractive resources like oil, gas and minerals. By 2013, then-Minister of Energy and the Coal Industry Eduard Stavitsky was one of the big fans of strengthening transparency in the gas extraction sector in Ukraine. The Azarov Government was looking for opportunities to cooperate with major international corporations. Promises that it would be more honest and transparent were supposed to encourage them to work with Ukraine...

But in March 2014, right after the Revolution of Dignity, the police came to search Stavitsky's home. The minister had already fled to Israel,[1] but they managed to find 42 kilograms of gold, US $4.8 million in cash, and 16 gold watches.[2] Much of this treasure was likely gained in return for his actions in the extraction sector.

Unfortunately, international practice has shown that Ukraine is not the only country whose leadership finds ways to formally implement international commitments while, in fact, preserving traditional ways of taking advantager of public office.

Every country is unique in its own way: it has its own rules, its traditions and its style of relations between the government, business and civil society. Ukraine's experience is not a model other countries can simply copy. For one thing, it has a lot of missing pieces in this puzzle that still

1 https://www.timesofisrael.com/wanted-ukrainian-oligarch-granted-visa-to-israel-ex-minister-gets-citizenship/

2 "42 kilograms of gold found at ex-minister's home," Gazeta.ua, March 25, 2014. – https://gazeta.ua/articles/ukraine-newspaper/_v-eksministra-znajshli-42-kilogrami-zolota/548892

need to be filled in for the quality of management in its extractive sector to improve. Still, in any country, as in Ukraine, civil society can provide the institutional memory that will, step by step, drive the Transparency Initiative, regardless of any political shifts or even cataclysms.

Today, CSOs have really many of opportunities to improve their level of understanding. Great learning options are available online. There's the Eurasia Hub at Khazar Uniersity in Azerbaijan, where a many of our Ukrainian activists have studied, and MinEnergo officials, too. There's the Blavatnik School of Governance, with which NRGI works closely. We were also fortunate enough to be able to take a short course at Columbia University's Center for Sustainable Investment (CCSI), where they talked about the basic principles of managing natural resources. All the teachers at these institutions were open to discussion and ready to help finding solutions to specific problems. Their only requirement to provide us with clear, understandable assistance was for us to formulate problems in the most specific terms possible.

NRGI and the IRF provided funding for smallish projects to launch an EITI site in Ukraine, publish brochures and run a number of public events. The International Renaissance Foundation continues to be one of the key partners for civil society and its Democratic Practice Program

Director Oleksiy Orlovsky, is now a member of the EITI International Board. NGRI also continues to support Ukraine, offering both third sector individuals and Government officials opportunities to take courses at Khazar University's Eurasia Hub in Azerbaijan to improve their natural resource management skills. With the support of NRGI, a number of brochures and policy briefs have also been published, and public hearings were held with Ukrainian MPs to advocate EITI legislation.

What's even better is when courses and workshops happen to involve all stakeholders at the same time. For instance, when international donors hold workshops for civil servants, why not invite CSOs to participate as well? The same with study trips for government officials: why not make the delegation a mixed group? After all, donors can never know when some official or other doesn't end up leaving a post and possibly that same community activist that they were training yesterday ends up replacing them tomorrow, because they already have the necessary knowledge base. What's more, when that civil servant and the community activist meet to discuss specific details of energy policy, wouldn't it be better if their knowledge was at a similar level?

Governments may come and go, but civil society stays around

When we began our advocacy of the Extractive Industries Transparency Initiative, it was clear that each of the stakeholders – the president, the Government and civic organizations – had a different idea of what the EITI Standard was and how it was supposed to work. For some, it was going to add a little sheen through nice-sounding PR, for others it was a way to really make the industry more transparent. We could have begun by insisting from the start on our view of the purpose of the Initiative and then moved on to implementing it. But we chose not to try to stop the Government from thinking what it wished.

Over the course of a decade, from the Government's initial declaration of its intention to join the EITI in 2009 until 2019, ministers changed five times[3] and most of them knew next to nothing about the Transparency Initiative. Having figured out the standards, each politician formed his own position regarding the EITI: some believed in the importance of increasing transparency in the sector in order to better manage it, others saw this as a "bridge" to cooperation with international donors, and some did not like the Initiative, seeing it as an instrument designed for backward "third world" countries.

During each of these periods, we found ourselves having to choose a different strategy for moving the EITI forward: working with ministry leadership, pressuring them together with other partners, or providing

3 According to information from the Ministry of Energy and the Coal Industry: http://mpe.kmu.gov.ua/minugol/control/uk/publish/article?art_id=244915407&cat_id=244915403

explanations and arguing persistently about the importance of more transparent and professional management in the sector. Sometimes a combination of these approaches worked best. Still, what was important was that, regardless of the constant Cabinet shuffles, we were able to move the Transparency Initiative forward in Ukraine, to involve new partners, to interest additional stakeholders, and to reach new standards of work in the sector.

When time came around to the latest implementation phase, a second revolution had hit the country, a new government came to power, and civil society, as the bearers of institutional memory, wrote up the goals of the Initiative and the steps needed to reach them, helping the ministry to fulfill the commitments Ukraine had taken on within the framework of international standards.

Civil society itself is in the best position to play the long game, reaching objectives and overcoming difficult obstacles, even when it takes several years to do so. Having worked for 10 years on the institution of the Standard, we are happy to tell our story to those who are only starting down this path.

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"There's more than one way to bake a cake"

The reality is that governments, businesses and CSOs often have different motives for implementing the EITI. The important thing is to focus on the desired outcome.

"We need to implement the Transparency Initiative because it's required by the World Bank."

Those were the words with which a meeting at MinEnergo began in 2013, when the deputy minister called companies and civil society organizations together to discuss the launch of EITI and the work of the Multi-Stakeholder Group. At that time, the Government did little to hide the fact that the Initiative was mainly needed to fulfill certain commitments to international partners. Talks were going on with the major extractive companies about natural gas in Ukraine, and international donors were setting the requirements for reforms in exchange for technical assistance. The EITI was one of them.

We looked at each other and didn't know where to start.

"Our company has been part of Multistakeholder Groups in other countries," said the man from Shell Exploration and Development in Ukraine. "We're ready to help, even with setting up companies." Since few participants at the meeting had in-depth knowledge of the Transparency Initiative and Ukrainian companies were just beginning to get a sense of it, everybody agreed to his proposition.

The launch of an EITI Multistakeholder Group varies from country to country. In Ukraine, the launch was not hyped up, altough it drew all the

key stakeholders: the public, the companies, the donors, Government officials, and the press. Still, when the Initiative was first launched, not many people in Ukraine knew anything about it. Working in the MSG was strictly on a volunteer basis, unpaid, and so there was no formal competiton for places on anyone's part. The stakeholders simply got together, each party presented its own priorities within the EITI framework and took the priorities of others in the group into account, and we got down to work.

At that point, although the Ukrainian press was not writing much about the Transparency Initiative, it was actively discussed in the donor community. The World Bank insisted that the Initiative be implemented. A number of embasssies added their voices, including the British and the Americans. The idea of implementing the EITI in Ukraine was also supported by the EU Delegation to Ukraine, and so instituting the Initiative and publishing the first EITI report ended up among the conditions for the Government to receive EU technical assistance in 2014. This step provided additional incentive for Ukraine's politicians and the EITI immediately jumped high in MinEnergo's list of priorities.

Over 2013–2014, Ukraine slowly made progress in complying with EITI requirements. Each of the stakeholders was involved in this effort for different reasons. Where the Government considered it important to meet the demands of donors, civil society organizations wanted to get at least some more information about the sector out in the open, as much of the data was inaccessible and the industry was considered highly politicized and corrupt. Ukraine's business community, meanwhile, was keen to follow international quality standards and so, in the early stages, the companies trusted the initiative and leadership of Shell's people, who called the EITI an "international quality standard" for business.

Each of the stakeholders was involved in this effort for different reasons

And yet, while moving towards their common goal, all three sides deliberately avoided any discussion about whose motives and whose arguments were most important.

By late spring 2014, the Revolution of Dignity had ended, a new president was in office and, in the fall, elections brought many new young faces to the Verkhovna Rada. They were open to new ideas and initiatives. Several political parties who were working to form the ruling coalition got

together to draft a coalition agreement. We were invited as outside experts and were given the opportunity to advise this group of MPs about what bills should be a top priority for the Rada.Some politicians raised their eyebrows:

"An Extractive Industries Transparency Initiative? Reporting according to international standards? Our companies won't be able to switch to new reporting standards in two or three years. That's not realistic."

And so long and difficult negotiations began. In the end, the Transparency Initiative was left in, but it was no longer among the top priorities.

Including the Transparency Initiative in the coalition agreement was yet an other signal for the newly formed Government, as it was now being demanded, not just by donors, but also by the legislature. The new minister, who knew English well and considered attracting FDI a top priority, agreed to pay particular attention to the EITI. His team went into high gear working with the World Bank and soon Ukraine was able to set up an EITI Secretariat, consisting of four individuals who would work with the Multistakeholder Group just on the implementation of the Initiative.

Things now began to really move.

Enshrining the EITI in program documents, strategies and Government plans proved to be an excellent instrument to keep civil servants aware of the Initiative. However, it's one thing to do something because you feel it in your heart and another altogether when, in addition to this, your bosses are demanding that you report on results. And so, in addition to the coalition agreement, the requirement to implement the EITI was included in the Open Government Partnership Action Plan,[4] which Ukraine had

Enshrining the EITI in programs, strategies and Government plans was a great way to keep civil servants aware of the Initiative.

4 The First Presidential "Open Government" Action Plan, adopted by Cabinet

joined. A number of years passed and now this idea was being considered by many countries in the Open Government Partnership. Similarly, the Transparency Initiative was enshrined in the Concept for the Development of the Extractive Industries of Ukraine,[5] which was adopted by the Government in 2016 and is now regularly updated. The EITI is also in Ukraine's Cooperation Strategy with the World Bank for 2017–2021.[6]

Persuading companies to report according to EITI standards was a more difficult challenge, especially in Ukraine, where shady schemes dominated in the sector for decades. For a number of years in a row, the Independent Administrator kept telling members of the Multistakeholder Group during the presentation of that year's EITI Report:

"Try to interest companies in being more transparent and public. They don't seem to undersrtand what this Report is for."

We would look at the companies and they would look at us, each waiting for the other to make some kind of move.

"Our accounting department is already overloaded with all kinds of reporting requirements," said one official from a state company that extracts 70% of Ukraine's natural gas. *"With this Transparency Initiative, you're adding yet another template for a report. We aren't against the public knowing about our activities, but is there any way to make this all less complicated?"*

So we knocked heads together to think about how to make things "less complicated." First of all, we decided to check for ourselves just how many report forms Ukraine's extractive companies really were obliged to prepare. We were truly shocked to discover there were more than 40. Although many duplicated each other, each one required companies to fill out their form because the reports were going to different government agencies. We couldn't understand why the agencies themselves

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Order #220 dated April 5, 2012, contained a separate provision regarding the implementation of the Extractive Industries Transparency Initiative (EITI). https://zakon.rada.gov.ua/laws/show/220–2012-р

5 "The Concept for Developing the Natural Gas Extraction Industry of Ukraine," approved by Cabinet Order #1079-r dated December 28, 2016 року. https://zakon.rada.gov.ua/laws/show/1079–2016-р

6 Country Partnership Framework for the Period FY17-FY21, June 20, 2017. http://documents.worldbank.org/curated/en/847421498183265026/pdf/Ukraine-Country-Partnership-Framework-FY2017%E2%80%9321%E2%80%9305262017.pdf

EITI coalition members visit an extractive company, Poltava, 2018

couldn't get together and agree to exchange data and ease the burden on companies. Neither could the companies.

So we agreed with the companies that the next step in the EITI process would be setting up a single portal for company reports to which key government agencies would have access and be able to take all the information they needed from that one source. For the companies, this meant streamlining their reporting work and switching to electronic format. Yet, on their own, the companies could not have persuaded the government. Cooperating with CSOs gave this initiative a better chance and the companies more incentive to support the EITI. Today, the initial iteration of this portal has already been developed and expectations are that extractive companies will be able to report through the portal already this year, 2020.

Yet another incentive for companies to cooperate and implement the Transparency Initiative came from unexpected quarters. At this point, the EITI had become a platform for companies to compete for attractive projects at the regional level and to exchange experiences with social projects.

A conference was held in honor of the publication of the 2017 EITI Report.[7] More than 200 participants came: government agencies, donors, companies, CSOs, and journalists. Many individuals from communities in extractive regions were also invited. Panel discussions included managers of state-owned natural gas extraction companies. During the Q&A session, the mayor of a rural community in which this company operates stood up and said:

"Your company extracts on the territory of our village. How come we can't put together a joint project to help our village develop? I'm the mayor and my fellow villagers keep asking me how come our village is in worse shape than the village next door. A private company is drilling in this neighboring village, and they and the village put together a development plan that they are now carrying out. So, let's you and us do something like that, too."

The effect was instant. The director of the state company supported the proposition. After this public dialog with the communities and the start of competition among companies, they began to pay noticeably more attention to working with the regions. The members of the national EITI coalition joined this cooperative effort. The regional organizations that, strategically, we had rightly invited from the outset of the Multistakeholder Group, have been helping local communities find information about companies operating on their territories and the taxes they pay, and they are engaged in many joint discussions with business about the future development of those regions.

EITI had become a platform for companies to compete for attractive projects at the regional level and to exchange experiences with social projects

International financial institutions (IFIs) provided yet another incentive for businesses: information about a company's readiness – or lack thereof – to open up its payments within the framework of the Initiative was one of the criteria for

7 Information about the conference can be found on the Cabinet of Ministers official site at: https://www.kmu.gov.ua/news/249760749

EITI Conference in Ukraine, 2017

determing that company's creditworthiness. This was especially helpful to support business interests at a time when reporting was still not mandatory and we had to argue in favor of adhering to high standards and international practice when asking the companies to provide information. At one point, we were holding our regular meeting with the EITI National Secretariat when its head, Dina Narezhneva, suddenly said:

"The European Bank for Reconstruction and Development has approached us and asked which companies have provided their data for the report. The Bank was interested in this information in order to assess whether to lend to some of the companies or not."

For us, this was great news. Of course, we made use of this opportunity to publicly praise those companies that were reporting according to standard and to blast those who were against being public. But the EBRD's arsenal of instruments was far more persuasive for reluctant companies than simply a public campaign of naming and shaming. The Bank continued to monitor the EITI implementation process and supported the Law on transparency in the extractive industries[8], which undoubtedly served it well in dialog with the Government and the companies.

8 The Law "On ensuring transparency in the extractive industries," adopted by the Verkhovna Rada on September 18, 2018. https://zakon.rada.gov.ua/laws/show/2545–19

Many foreign experts kept suggesting that the Transparency Initiative really remain a voluntary matter, that all that was needed was for someone to talk to both companies and the Government to persuade both sides of the benefits to them. Now, there may be countries in which such an approach would work, but in Ukraine, especially in certain sectors, it would not. If the oil and gas extraction industry agreed to open data on taxes paid, albeit cautiously, in the coal industry, where some of the most substantial government aid is concentrated, and in the ore mining sector, companies flatly refused to send any data for the purpose of the EITI Report.

After a number of unsuccessful attempts to come to a compromise with extractive businesses, we all agreed that *the best incentive for companies that did not wish to open information about themselves was to make it mandatory*. And so, the Ukrainian EITI team came to the conclusion that there had to be a law ensuring transparency in the extractive industries. We were proved right when, after a few years of ignoring the Initiative, interest in transparency and accountability suddenly took off among companies in the ore and coal mining sectors.

"If you want to go fast, go alone. If you want to go far, go together"

African proverb

For us, partners aren't just other civic organizations. They really include everyone who is interested in real reforms. In Ukraine, we've had different partners at different stages.

The first ones to "bring" the EITI to civil society in Ukraine were the institutions whose networks have been working to open data in the extractive sector – with the public all over the world, the International Renaissance Foundation in Ukraine, and the Revenue Watch Institute, which is now called the Natural Resource Governance Institute. Those of us committed to the idea of instituting the EITI in Ukraine began to be invited to other countries, like Kazakhstan and Azerbaijan, where the initiative had already been implemented.

When we began our public activity back in 2011, the ministry was in no hurry to take any commitments on, but the British Embassy, Shell Exploration and Production in Ukraine, and the World Bank joined our initiatives. For a long time, embassy officials helped organize and participated in all the negotiations and discussions. They brought up the issue of implementing the Transparency Initiative in their talks with the Government, and all this helped us keep the EITI at a fairly high priority level within the Government. The implementation of the Transparency Initiative was also supported by the American and Norwegian Embassies in Ukraine.

Nearly every country has development agenies that help carry out structural reforms. In Ukraine, some of these agencies, especially Germany's GIZ and USAID also followed the Transparency Initiative.

UA EITI Brainstorming session, Lviv, 2015

There's never any guarantee that such organizations will immediately come to the table with big systemic ideas or projects, but even small amounts of support are very important at the beginning stages, even if they do not involve funding.

Not long after the Revolution of Dignity ended, a GIZ consultant by the name of Mr Lutz Neumann came into our office. He asked us a lot of questions about the Transparency Initiative in Ukraine and our work in the Multistakeholder Group, took some notes, and disappeared. Some time later, when we had long forgotten about the meeting, the ministry approached us:

"GIZ wants to hold a strategic session with the members of the Multistakeholder Group to put together a joint Work Action Plan."

To be honest, initially we were all very skeptical about the idea. What kind of strategic session when people don't really even understand what the Initiative is? We needed time to get the details of the standards worked out. As it turned out, we didn't have the time:

"Based on the strategic session, the Multistakeholder Group needs to put together a Work Plan," said Mr Neumann bluntly. *"In the Work Plan, you can divide the commitments among you. You have two days to do this."*

We don't know how we did it, but with Mr Neumann's help, we did draw up a Work Plan and even managed to divide the responsibilities among

ourselves. After quarrelling and making peace several times, we – members of the third sector, the Government and companies in the Multistakeholder Group – really did begin to understand each other a lot better.

The members of the group from the Government who took part in the first strategic session have continued to follow the EITI closely, even when the Initiative is no longer part of their remit. Moreover, this kind of understanding and trust among us continues to this day. Now GIZ is focused on supporting the set up of an electronic platform for companies to report through, which will streamline the process of drafting the report and expand access to data in the extractive industries.

Once Germany joined the EITI effort, we decided to expand cooperation between the Multistakeholder Groups of both countries, which was both intersting and very useful. The EITI National Secretariants (Dina Narezhneva and Olesya Nekhoroshko from Ukrainian side) exchanged experiences and plans, and we learned from each other. For instance, the director of the German EITI Secretariat ran a seminar in Ukraine on monitoring and assessing EITI implementation. Members of the MG began cooperating horizontally and we got to know some great German civic organizations with whom we went on to work on a number of joint EITI projects.

Meanwhile, USAID also decided to support the Transparency Initiative in Ukraine. In contrast to GIZ, which worked primarily with the Government, USAID supported the third sector, especially the advocacy of a law to ensure transparency in the extractive industries. We ran a number of public events where we explained the importance of access to information in the extractive industries, videoed an appeal from the communities, animation and infographics for the Verkhovna Rada, and explained the details of the bill to MPs. Thanks to USAID, we able to use our time and opportunity to put the maximum of effort into getting the bill passed.

Even small amounts of support are very important at the beginning stages, even if it does not involve funding

Ukrainian MSG visit coal mine in Germany, 2017

Since we understood that the Transparency Initiative was more than just the publication of the EITI Report, that it was an instrument for improving management in the extractive industries, we gained support from our donors to expand the framework of our work in this area. This allowed us to study best practice and join a working group under the Energy Ministry. Since MinEnergo runs competitions for production sharing agreements (PSAs), we were able to monitor the transparency and effectiveness of decisions to award PSAs. What's more, being funded by outside donors – USAID in our case – made it possible for us to remain independent of both the Government and the companies.

The World Bank proved to be an excellent partner for the Government. The Government's first steps started with the statement, "We need to implement the Transparency Initiative because it's required by the World Bank." This became possible through the efforts of Astrid Manroth, the senior economist at the Bank's Kyiv office, who very effectively made sure the Transparency Initiative remained among the Government's top priorities. The first EITI Report, as well as the launch of the EITI National Secretariat, was done with the Bank's assistance. MinEnergo itself received a WB grant to implement these goals. Thanks to the project team of Ilhem Salamon and Daksha Shakya, we were able to put together an effective system of cooperation together with the National Secretariat. This allowed us to really help each other, so that the

implementation process did not have to stop. Whoever takes on managing a project is very important for that project's success: if the task team leader (TTL) is concerned with your country and is in constant contact with the EITI team at the national level, you've won half the battle.

The World Bank's initiative was picked up by the European Bank for Reconstruction and Development (EBRD), which joined the implementation monitoring process and provided public support for passing the bill ensuring transpareny in the extractive industries.

While the European Union as a whole is not an extractive region, the European Commission also took on the role of partner in this process. When it came time to raise the EITI in the Government priority list, the demand to produce and publish an EITI Report showed up among the requirements for receiving EU technical assistance. When the bill on transparency was being debated in the Rada, a post appeared in the social networks of the EU Delegation in Ukraine announcing that the European Union supported this bill.

In 2018, Ukraine decided to fight for the Global EITI Conference to be held here. We lost the bid to France – it's pretty hard to compete with Paris – but there was support for the idea of holding the conference in Kyiv at a meeting of the EITI International Board in February 2019. When we heard about this decision, our first thought was "How cool!" Our second thought was, "Where do we get the money to run this event??" The host country is supposed to take care of things but the state budget had

EITI Board Meeting in Ukraine, 2019

not anticipated such an event and MinEnergo could, at best, offer moral support for the Board meeting to be held.

"The International Renaissance Foundation will fund the conference," was the first good news we heard from the IRF's Oleksiy Orlovsky.

We also approached other donors. They weren't against supporting the meeting, but they wanted specific proposals from us. We proposed holding a series of small roundtables, each of them focusing on a specific aspect of interest to Ukraine and those participating in the EITI International Board. This got us support from the EBRD for a roundtable on corporate governance in the power industry and from German Government's GIZ for practices in instituting electronic reporting at the EITI. By the beginning of the Board meeting, we had a pretty decent list of donors, from the World Bank, which was funding the time and work of the EITI Secretariat, and USAID, which was funding the work of the Dixi Group, to the EBRD, GIZ and the IRF, who funded the roundtables, the donor dinner, and the official reception. In addition to taking care of meetings and discussions, Ukraine gave each of the members of the International Board a small gift, prepared a brief video on the event, and gave a tour of the Verkhovna Rada. Meanwhile, the funding from donors was enough to hold an additional roundtable on Ukraine's experience during the Global EITI Conference in Paris in June 2019.

We found partners among CSOs and communities in extractive regions

In the end, your partners needn't be outside stakeholders such as donors or embassies. We found partners among CSOs and communities in extractive regions. Not all of them were active supporters of the EITI in Ukraine, but all of them supported the idea that there needed to be quick and easy access to information about the activities of such businesses, including those in their region.

At one point, a the EITI bill was added into the Rada work plan and a week was left until it was scheduled to be debated. As usual, we needed to run a campaign among MPs to bring the bill to their attention and explain why it was important. There wasn't enough time to prepare an

infographic, let alone print up banners.

"Hey, let's tape an appeal from our regional communities and community organizations," our communications manager proposed. *"I'll put together a short video."*

We didn't see any other options, but we quickly found people in these communities who wanted to be involved in the video. Of course, taping people via skype left a lot to be desired, quality-wise, but the result was nice: people were sincere in their appeals and exhortations. The clip quickly started being shared in social nets, including among MPs, who are very active users of new technologies.

What's more, a number of MPs themselves have, after advocating for the bill for several years, become partners in promoting the EITI. Nearly every political party had a few MPs who understood how the Initiative worked and the reasons why it mattered – and were able to explain to their factions what the bill was needed for. This didn't always work, but we knew whom to approach if we needed to disseminate information about the EITI in a hurry. Of course, our international partners also helped in this. For instance, with the support of NRGI, two MPs, Olha Bielkova from the ruling party and Oleksiy Riabchyn from an opposition, were able to study at the Blavatnik School of Government.

Strangely enough, our least active partner was the press. Back at the beginning, we were able to work effectively with one of the country's top analytical weeklies, *Dzerkalo Tyzhnia*. Together with their writer, Alla Yeriomenko, we participated in a Global EITI Conference in Paris, where we interviewed a number of the key speakers. However, things never went further than occasional interest from individual journalists. On the contrary, at the time when Ukraine was preparing its first EITI Report, articles appeared in the press saying that the EITI was an attempt by Hungarian-American financier George Soros to get access to Ukraine's natural reserves! This kind of conspiratorial attack had to be responded to. Later, it turned out that some fairly unprofessional journalists had simply republished rumors and comments without in bothering to check the facts or understand the topic. It made us realize just how much more still needed to be done with the fourth state.

"We may have all come on different ships, but we're in the same boat now"

Martin Luther King Jr.

When a Multistakeholder Group is set up, sometimes even the Standard isn't enough. Plenty has been written about the rules for the group's work, but when the real work begins, respect for the rule of parity among partners is key.

When time came to discuss setting up the Multi Stakeholder Group and who should be in it, the deputy minister turned to us as the CSO and said:

"Organize yourselves independently. We won't interfere in your process. For our part, we have just one requirement: at least half your organization needs to be in the regions. Be closer to the public."

It's only now that we can recognize that the proposition that we organize ourselves was strategically the right move. It turns out that, in many countries, the ministry can't completely trust this process to civic organizations. Sometimes the Government wants to have "obedient" members in the Group or is afraid that the organizations will quarrel among themselves, delay the process and only make more problems for the Government and the Initiative. Despite all the risks, independently organizing the representation of the public in the Multistakeholder Groups is the only possible approach. For the civic sector, this is also a test of its maturity and responsibility, and the ability of its members to agree among themselves.

We agreed to the minister's proposition to go ahead and return with a list in which half the members would be from regional public organiations. In the end, we understood that we really did need to have a strong link with the extractive regions. With the support of the International Renaissance Foundation, which operates with possibly the largest number of civic organizations in all the oblasts, we were able to find a few organizations that were interested in joining the Multistakeholder Group and working on the Transparency Initiative.

"How are we going to vote, by simple majority?" asked the deputy minister at one of the first meetings of the group.

Suddenly everyone was looking at everyone else suspiciously. What if the companies and the Government suddenly agree between them to support a certain decision and civil society couldn't affect it?

"OK, then let's vote in such a way that at least every party has to support the decision," someone proposed. *"Better yet, a simple majority from each of the stakeholder groups."*

The idea appealed to everybody. The next step was deciding where to set down such consensual agreements. We clearly needed to put together rules for the work of the Multistakeholder Group.

"Let's have the ministry staff draft something, then we can all agree to it," the deputy minister suggested.

Independent representation of the public in the Multistakeholder Groups is the only approach. For the civic sector, this is a test of its maturity, responsibility, and the ability to reach consensus

This was obviously the simplest and fastest approach, but it gave the ministry free rein to write rules that might restrict options for other parties. And so we agreed to set up a separate group to draft and propose one version of these rules. This subgroup included staff from the ministry, the companies and the public. The resulting document was really good and those rules have governed our activities for the last few

UA MSG Meeting, 2016

years. When we felt a need to revise them, the principle of joint work on the rules was applied once again, and once again the result was good.

The Ukrainian EITI has yet another unique feature. From the very start, when the Multistakeholder Group was just set up, all the stakeholders agreed that if the chair was an official from the ministry, then the deputy had to be from one of the other parties – eiher from business or from the public. During the first vote, the companies generously gave this post to civil society and, for now, the post remains ours until further notice.

This is actually a good approach that is worth other countries' following. If participation in the MSG is real and not just window-dressing, the public also carries some responsibility for the effectiveness of policy decisions. These organizations prepare better for meetings, they formulate their positions, and they are ready to compromise. This is the right path to constructive cooperation. Moreover, at a time when the responsible ministry might be unable to effectively manage the Multistakeholder Group, such as during a Cabinet shuffle, having a deputy from a different stakeholder group means the MSG does not lose functionality and can continue working even as power is transferred from one political force to another.

Ukraine is a country that has seen five energy ministers come and go while the EITI was being implemented. There were times when the ministry was operating in stand-by mode, with many decisions and processes on hold. Luckily, these processes did not have a serious impact on the Initiative, as the Multistakeholder Group was able to keep meeting and working even during a hiatus between outgoing and incoming ministerial teams. Effectively distributing functions, powers and responsibilities has made it possible for us to keep moving forward.

If participation in the MSG is real and not just window-dressing, the public also carries some responsibility for effective decisions

It wasn't long before something went wrong, though. This happened after the Law on transparency in the extractive industries had passed. Instead of simply remaining an unofficial consultative body, the Multistakeholder Group suddenly became an instrument for influencing policy. More and more attention was paid to the group, the number of those wanting to join it also grew, and the Government's desire to have more control over the group's decisions grew as well.

The ministry now took it upon itself to rewrite a new set of rules independently. When we received the draft rules, they were missing the requirements related to the Standard, while the leadership of the group – the chair and deputy chair – both went to the ministry. We protested and the companies supported us.

"You cannot violate the principle of parity in cooperation," we told the deputy minister, who insisted on her version. *"That's what your version of the rules does."*

"Then I'll wash my hands of the Transparency Initiative," she threatened. *"It can go to another deputy minister and you're going to find that's even worse."*

"Let it go."

Unfortunately, this quarrel dragged on for several months. Finally, the

minister became involved in resolving the situation, but we had lost precious time. The bylaws underpinning the new law, according to which companies should have started reporting in September 2019, were not adopted in time. Reporting under the new rules was postponed for at least a few more months. On the other hand, the alternative – allowing the ministry to dominate the group simply in order to meet deadlines – would have been a real disaster.

The work of National Secretariat is a very important element in ensuring an equal partnership, as it is responsible for organizing the work of the Multistakeholder Group, maintaining contact with its members, and disseminating information about the EITI. It really matters for this process that the members of the Secretariat pay equal attention to all the stakeholders. Imagine if the International EITI Secretariat listened and gave more credence to, say, government officials on the EITI International Board, or business members. It would certainly upset other stakeholder groups. This is equally true for seretariats at the national level. The principle of equidistance, in turn, determines the answers to questions, such as, who finances the members of the Secretariat and on what basis they are elected.

It really matters that the members of the Secretariat pay equal attention to all the stakeholders

The rules of the Standard do not say anything about how it is supposed to be funded. Moreover, widespread practice places the secretariats under ministries, and civil servants work in them. Major donors even support this principle and, in some countries, this formula works. Even in Ukraine, it worked when the EITI process was just beginning. But, in some countries, government employees in a secretariat can be openly biased in favor of the ministry. And that's when the other stakeholders become unhappy. Instead of preventing conflicts, the secretariat becomes a source.

"Ask your donors for outside funding for your National Secretariat. And select its members through open competition – at least for the first year or two."

This would be my recommendation to CSOs whose countries are just

starting to set up a Multistakeholder Group. At least for the first period, let this Secretariat work on the basis of independent donor funding and let its staff be hired through open competition. Once the standards for quality and unbiased work are established, it becomes much easier to uphold these principles when the Secretariat's sources of funding change. And when the Secretariat really brings together all the stakeholders, the results of cooperation are quicker and more visible to all.

At one point, we came to MinEcon, which is responsible for working with international donors, including the World Bank, to ask that funding for the Transparency Initiative at the ministry be extended, including funding to support the National Secretariat. By we, I meant myself from a CSO and Dina Narezhneva. At the ministry office, eyebrows were raised:

"Why have you two, from an NGO and the project, come to defend MinEnergo?"

The ministry needed additional human resources to staff the Secretariat. It wasn't easy to second civil servants to these functions, since the country was in the midst of major reforms of its government system. For us, the NGOs, it was important to maintain outside funding for the Secretariat in order to keep it independent of the Government.

As luck would have it, one of the staff at MinEcon actually wanted to hear our arguments and she was prepared to accept our explanations. Our meeting ended well and the question of extending funding was added to the agenda for the meeting with the World Bank, where MinEnergo also confirmed its position. As an NGO, we weren't part of this project that the Bank was funding, but we were prepared to support the ministry in arguing for the need for such a project. It didn't matter where the necessary people were found – in government, in private companies, in NGOs or in the National Secretariat – mainly because professional, knowledgeable people can be found in all those places who would have the time and opportunity to implement the Transpparency Initiative in Ukraine.

"Do not lie in a ditch and say, God help me! use the lawful tools He hath lent thee"

English proverb

When you know what the next step needs to be, it's easy enough to announce it, to get people interested in taking it, and to involve others. This is precisely the way in which NGOs can shape the agenda.

"Draft a bill and we'll work it up and submit it to the Rada."

That's about how our conversation with MinEnergo began with regard to a bill to ensure transparency in the extractive industries. Nobody at the ministry felt like writing the first draft of the bill, nor were they really capable of doing so. Those who understood the Transparency Initiative were not lawyers, while the ministry's lawyers knew very little about the Initiative.

Of course, we could have answered, "Hey, that's your job," but why? We had the opportunity to be first to draw up a bill like this one, which was both interesting and needed by the public. And so we went off to see the International Renaissance Foundation.

"Can you help us hire a lawyer with whom we can draft a bill on the Extractive Industries Transparency Initiative?"

The Renaissance Foundation liked the idea. We put out a call for offers, selected a lawyer, and began to work. In a few months the bill was ready to go. We took the bill, together with the lawyer, and went back to MinEnergo.

"Here's your bill. Let's talk about it and come up with a joint version, submit it to the Government for approval, and then on to the Rada."

For some reason, though, the ministry lawyers weren't happy with the document. It wasn't very clear to us what exactly they didn't like and every time we met again they had new objections. Things went like that for more than six months. At that point, our lawyer had already been working with us *pro bono* for quite awhile, reliably came to meetings at the ministry, and dotted every I and crossed every T with the ministry lawyers. Finally, we understood that there was no point to advocating the law that way any further. It had no chance of being agreed and approved by the Government because of bureaucratic hurdles and the stonewalling of the in-house lawyers.

"Guys, let's just go to the MPs themselves and propose that they submit this to the Rada as their own initiative."

In Ukraine, not just the Cabinet and president have the right to propose legislative initiatives, but any member of the Verkhovna Rada does, as well. It's fairly common practice in Ukraine for MPs who are interested in a specific area to register a bill on their own initiative because the profile ministry is capable of draft a quality document and submit it to the Cabinet. And that was exactly what happened with our bill.

In 2015, we had been lucky to find a real champion of the Transparency Initiative. It turned out to be, not someone in the Government, but an MP, Olha Bielkova. Bielkova had just joined the VR energy committee and was working on ways to expand domestic gas extraction. The Transparency Initiative was a nice element of such a policy. Bielkova participated in the EITI conference that was taking place during the meeting of the International Board in Kyiv. She then applied to become a member of the EITI Board and won a seat. And she agreed to sponsor our bill.

"However, there's one condition," she said. *"Before I register this bill, its text has to be supported by everybody: the NGOs, the companies and the Government. You're going to have to find a compromise."*

And so to MP Bielkova we went again, when the decision was made that Ukraine needed to legislate the opening of data in the extractive sector. Shoulder to shoulder, we worked with her to promote a bill to ensure the transparency of these industries for nearly three years, studying

MP Bielkova chairs a session on hydrocarbon sector reform, 2019

international practice, looking for compromises with other stakeholders, and explaining to other MPs the importance of access to information in these industries. Bielkova could easily have walked away from our initiative many times, especially when the VR failed to pass the bill and we had to start everything from scratch again.

We spent a lot of time talking to companies while they slowly agreed on the amount of data that was supposed to become open, and the size of fine that would be paid if a company evaded opening its data. We did have to give up some of our positions: as of 2019, contracts do not have to be completely accessible, just their essential bits.

Every time we had to answer "why" and "what for," we needed to bring up international examples, statistics, and best practice in other countries.

While digging into the details of the bill and looking for compromises, we actually improved our own understanding about the way the extractive industries were being managed. Every time we had to answer from the politicians and companies "why" and "what for," we needed to bring up international examples,

statistics, and best practice in other countries. And to do this, we ourselves had to learn.

One great way for us to learn has been through the experience of CSOs in other countries. The Publish What you Pay (PWYP) coalition offered us a great opportunity to network with others during joint courses and conferences, where we began to connect with other organizations and experts who could quickly answer about other countries's experience on different issues. Sometimes when we needed to find a quick solution, this kind of support from our international partners was extremely important.

One day, just before the next vote, we were sitting around a table in the office and couldn't come up with a good story or image that might persuade our MPs to vote for the bill.

"Let's draw a hill and how we have to climb that hill to get to the peak: complete transparency," someone suggested.

People didn't agree: it wasn't entirely clear how climbing a hill was supposed to represent greater transparenncy.

"OK, let's show some economic charts."

People again didn't agree: not every MP would understand economic figures and indicators.

"Hey, how about illustrating some kind of fairytale. Like Snow White. Everybody knows that!"

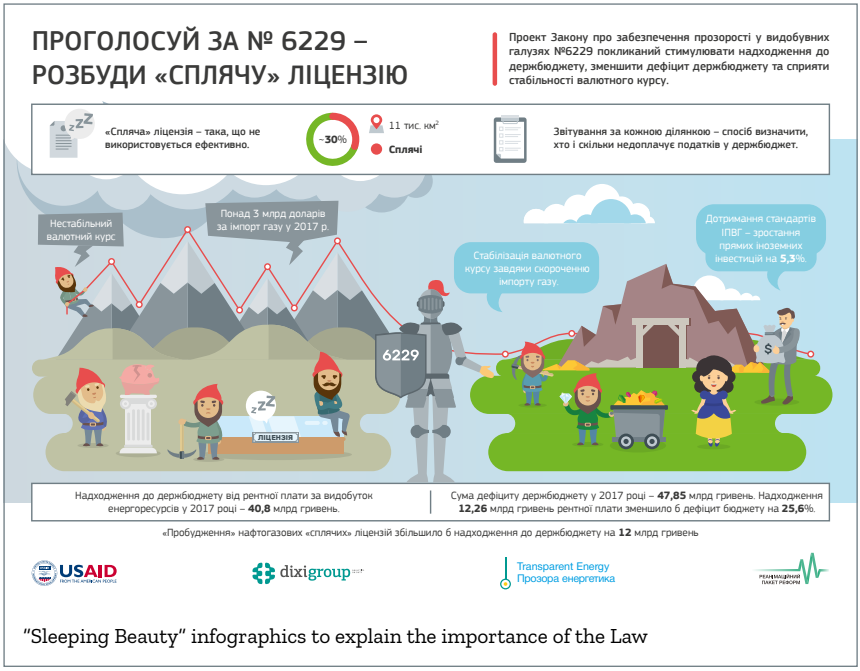
People liked this idea. Snow White became Sleeping Beauty and that turned into the Tale of the Dormant License – something companies keep for years without using, waiting for a convenient moment to sell it. As many as 30% of all extraction licenses in Ukraine are dormant! By requiring companies to report on every license, a law on transparency would make it possible to identify these cases. And that's what we all agreed on.

Then the question arose, how to disseminate this inforgraphic among MPs. The best option would be directly in the chamber for voting, because by the time an MP gets to the sessions hall, the person will have forgotten which papers were handed out by activists. But only MPs were allowed in the hall.

We turned to our partners in the coalition, the Reanimation Reform Package. They advised us to give the package with the infographic to one of the MPs, and that person could then distribute it in the hall. We found such an MP and when the rest of the lawmakers got to their seats, Sleeping Beauty was lying on their tables. Within minutes, they were taking pictures of the graphic and sharing it in Facebook. So we actually managed to get the MPs to pay attention to our bill. The response was quite inspiring, actually!

Besides the infographic, we had prepared a video for MPs with representatives of CSOs from extractive regions, and cartoons, and we hung banners in the Government quarter. Together with our partners, we organized roundtables for MPs and press conferences. There was a lot going on, but we all understood that, for the bill to pass, there had to be a political decision in each faction and party – including those that represented business in the extractive industries.

And that's where we hit a brick wall.



"Sleeping Beauty" infographics to explain the importance of the Law

EITI bill banner in the Government quarter, Kyiv, 2018

Although the majority of large gas extracting companies publicly supported transparency, and many of them had already started sending their data to the EITI Report, the political forces that represented the interests of these businesses were in no hurry to enshrine this pratice in law. It seemed that everybody was paying lip service to the idea of transparency, but when it came time to vote, very few supported it. In the end, the bill failed to pass in March 2017. We were back to Square One yet again.

For the next year and a half, we again held meetings and discussions, and involved our partners among donors and embassies. Somehow, we didn't feel like we'd lost. I understood that we would win in the end, that the bill would pass, when a staffer at one of the extraction companies came up to me at one event and quietly said:

"Our management's against adopting this law, but we're in favor and we're slowly persuading our boss. Just give us a little more time."

In the end, management was persuaded and not just through the efforts of their employees. Among others, Ukraine's power industry was paying more and more attention to its international business reputation,

including in the EU. With the European Commission paying attention to the EITI, it became clear to certain directors in Ukraine's extractive industries that voting for the bill was important.

A few weeks later, a second vote on the transparency bill took place. We were about to learn a new and very valuable lesson.

It was the morning of the day the bill was on the agenda for a vote. We had counted all the votes the night before and figured that one of the political forces that had declared it was fighting corruption would support the bill. Suddenly, an hour before the bill was brought to the floor, a series of mutual insults among political factions led this party to announce that it was not planning to vote at all that day for any bill whatsoever – including our EITI bill. We were at a loss: thanks to some childish squabble, there was a risk that the bill would once more fail to pass. I texted an MP from this party whom I knew personally:

"What's going on with you guys? You're about to wreck all our efforts and the work we've done together."

His cynical response came back:

"That's politics."

At that point, I was prepared for a repeat defeat of pur bill. But this time, MPs who represented the extractive business supported it. We learned that those MPs who are partners in the advocacy effort won't necessarily be your partners when push comes to shove. The result can always take you by surprise.

What motivated MPs to finally pass the bill to ensure transparency in the extractive industries? For many politicians who were concerned with their public image, it meant supporting the bill under slogans about fighting corruption. True, while competiting for popularity, some of these politicians proposed changes that would later likely lead, once again, to corruption and manipulation. For instance, one proposal was to withdraw licenses from companies that refused to provide complete information for the Report. We could just imagine if, afterwards, officials got to decide what constituted "complete" information and what didn't.

For some politicians, the bill was important for their work with the public, as they were elected from regions here petroleum or gas is extracted.

Politicians who represented extractive businesses were motivated by the fact that their companies wanted a nice image in the EU and the European Commission's recommendation of this bill was a decisive factor.

Having analyzed our entire process, we would never say that advocacy for a particular piece of legislation is the result of some specific individual's efforts – a civic organization, a politician or a company employee. The success of advocacy lies in finding good partners, building a solid working relationship and working together with all sides to reach certain goals. This is the only way to succeed.

The success of advocacy lies in finding good partners, building a solid working relationship and working together to reach clear goals

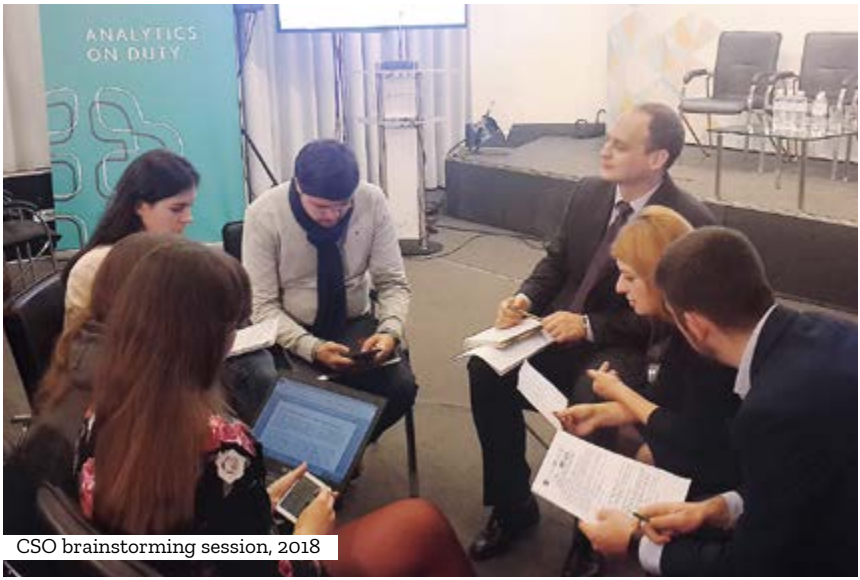
"The best way to find out if you can trust somebody is to trust them"

Ernest Hemingway

It's especially inspiring when you manage to build a really effective relationship at the level of ministry employees. In Ukraine, there are many people in the civil service who, like those working in NGOs, want to see results from their efforts, but because of bureaucratic obstacles and complicated approval processes, they don't have the power or don't want to fight the system. It's easier for them to simply "photocopy decrees" than to try to push through specific policies that are really needed. This is where the support of CSOs can make a real difference.

When we just began implementing the Transparency Initiative, ministry employees looked at the Initiative and at CSOs fairly skeptically. Among the ministries they began to nickname the EITI "Yeti," after the abominable snowman of the Himalayas. They assumed that the third sector would be coming to meetings and simply set additional, often unnecessary, tasks. But when the time came to draft and adopt working documents, work plans for the Multistakeholder Group, and reports on its activities, we got involved in the joint effort and the necessary documents were prepared on time with the help of all three stakeholder groups.

During the first year, there was no external EITI Secretariat in Ukraine, and so its functions were carried out by ministry staff. We could see that work on the Initiativre was an additional burden on them, and so we were happy to assist whenever possible. This helped a lot: slowly, but surely, the civil servants stopped looking at us cross-eyed and the two



CSO brainstorming session, 2018

sides began to understand each other better. The fact that we were moving the Transparency Initiative forward through these joint efforts, unlike many other reforms, was a real spur for all of us. We could all see results and that was very motivating all around.

One time, the Dixi Group was invited to a meeting with the energy minister organized by another NGO, "Together Against Corruption." During the meeting, the discussion was about why the ministry was not publishing a lot of data about the energy sector. In response to our questions, the minster shrugged his shoulders:

"I would be more than happy if the ministry were able to collect and publish a lot of data. We get hundreds of requests a day for statistical information and instead of being able to quickly send back the necessary data set, our staff has to spend weeks collecting it from various companies and government agencies. And I can't give them any new assignments because they're so busy."

We thought about what he had said. If the problem was not that the ministry was reluctant to publish data, but that it lacked the capacity, criticism wasn't going to be helpful. Maybe what we needed to do was something to improve capacity. We asked the minister to run an audit

of which data the ministry was receiving, how it was processing it, and how the ministry published it. The minister agreed.

For nearly a year, our analysts and experts worked with MinEnergo. Every department showed them what kind of data they received and what the sources were – other than those to which access was restricted –, and how this information was processed. As we had expected, the data came in by every imaginable means, other than maybe carrier pigeon: by fax, in Word documents, and sometimes simply over the phone. Of course, trying to process it for every individual request was very time-consuming. Together with our experts, the ministry personnel put together a template for data collection in open data format, so that it would be faster to collect the information, format it and publish it in open access.

Still, far from all the ministry's departments were able to arrange effective cooperation with us. Where in the power and gas sectors, it was easy enough to establish a dialog, the coal sector people flatly refused to reveal the way they collected and processed data, even though the minister had given his approval. Initially there was complete distrust on the part of these government employees towards the experts from our organization. But step by step, when the first sets began to come out in open data format and MinEnergo's statistics began to appear on the Government data portal, the department staff themselves began to turn to us for assistance.

Later, we realized that the Government needed to have standardized production sharing agreements: at one point, eight tenders had taken place at the same time and it wasn't clear how MinEnergo planned to negotiate eight different PSAs. We once again turned to new partner ISPL and got two sample PSAs. These we translated for the government staff who did not know English. Now we had a new task: to understand the fine points of standard PSAs and recognize which elements needed to be present in all future agreements between the Ukrainian government and exploration companies. It's not likely that CSOs will be allowed to participate in the talks – but then again, why not?

Cooperation at the executive level cannot be the only instrument in the advocacy toolkit in a goverment. The PM and ministers also need to be well-informed and support the implementation of reforms, including the Transparency Initiative. As in any other country, we struggled

with a constant lack of time for and attention to our topic in Ukraine. To discuss the details of the EITI workplan with the PM or minister made little sense. When you're given three minutes, all you can do is either tell them what decision needs to be made or complain about the specific official or agency that is in the way of such a decision. We made use of every precious moment to both emphasize the need for decisions and complain, when we knew that the decision was being blocked at a specific level.

Sometimes it's important just to keep moving forward in small steps

Advocating your position with business is harder. On one hand, they don't generally need help to improve their internal processes, while they often categorically reject the idea of, for instance, revealing all the details of their contracts. Still, our companies did like the idea of opening up data about extraction at the level of individual licenses. Private companies that really are engaged in extracting in Ukraine are interested in gaining access to unexplored fields, while the holders of licenses have often been hanging onto them just to resell at an opportune moment. In Ukraine, as many as 30% of all fields are in this situation, so serious businesses would like to see who is hanging on to these "sleeping beauties."

Of course, we don't always manage to reach our ultimate goals in the process of negotiating, and that's something you always have to be prepared for. Sometimes it's important just to keep moving forward in small steps. For instance, when the bill on transparency was passed, civic organizations were unable to get support for the idea of opening up all parts of the contracts. Today, the EITI law requires the opening of key elements of such contracts. In order for the process to keep going forward, that's good enough for us at this stage. Of course, the next step will be a campaign to get entire contracts to be open. This should be a lot easier after the first contracts are published and companies begin to understand that being transparent not especially threatening, after all.

CSOs and the National EITI Secretariat, Berlin, 2017

Institutions and abbreviations

BSG	Blavatnik School of Government
CCSI	Columbia Center for Sustainable Investment
D-EITI	EITI National Secretariat in Germany
DT	Dzerkalo Tyzhnia, an analytical Ukrainian weekly
EBRD	European Bank for Reconstruction and Development
EC	European Commission
EITI	Extractive Industries Transparency Initiative
EITI IA UA	Independent Administrator responsible for preparing the EITI Report for Ukraine
EITI IB	EITI International Board
EITI IS	EITI International Secretariat
EITI NS	EITI National Secretariat, under MinEnergo
EU Delegation	Delegation of the European Union to Ukraine
Eurasia Hub	Eurasia Hub, Khazar University, Baku
GIZ	Deutsche Gesellschaft für internationale Zusammenarbeit (GIZ) GmbH
IRF	International Renaissance Foundation
ISLP	International Senior Lawyers Project
Minecon	Ukraine's Ministry of Economy
Minenergo	Ukraine's Ministry of Energy and Coal Mining
MSG	Multistakeholder Stakeholder Group for EITI implementation in Ukraine, under Minenergo
NRGI	National Resource Governance Institute (formerly Revenue Watch Institute (RWI)
PSA	Production Sharing Agreement
PWYP	Publish What You Pay
RPR	Reanimation Package of Reforms, a coalition of NGOs in Ukraine
Shell Ukraine	Shell Exploration and Production Ukraine
TAC	Together Against Corruption, a Ukrainian NGO
TTL	Task team leader
UK Embassy	Embassy of the United Kingdom in Ukraine
US Embassy	Embassy of the United States in Ukraine
USAID	United States Agency for International Development
VR FEC Committee	Verkhovna Rada Committee for the Fuel and Energy Complex, nuclear policy and nuclear safety
WB	World Bank

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