

NRGI Organizational Evaluation

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Definitions of key terms used in the report

- The **decision chain** illustrates the process of converting natural resources into long-term sustainable development, from exploration and discovery to spending the revenues.
- **Implementation gaps** exist when there is a difference between what a law or code says and practice.
- **Isomorphic mimicry** is the tendency of governments to mimic other governments' successes, replicating processes or systems. It tends to conflate form and function leading to a situation where governments look like they have capacity when they do not or are being transparent when they are not.
- **Multi stakeholder** approaches involve engaging with and bringing together change agents from diverse institutions and organizations, for example from government, parliament, audit institutions, the private sector, media and civil society.
- **Open washing** is a form of isomorphic mimicry which usually refers to governments disclosing information that cannot be used or that does not indicate any real change in accountability attitudes or behaviors.
- **Political settlements** are the evolving processes through which the allocation of power is decided, often taking place between elites.
- **Resource nationalism** is the tendency of governments or other actors to assert control over their natural resources. This can take different forms, with some governments being more prepared to accept international investment under resource nationalism than others.
- **Transparency, participation and accountability (TPA)** initiatives seek to enhance accountable governance through advocating for increased access to information (transparency). When information is disclosed, citizens and civic groups can use it to participate in advocacy and oversight activities. They aim to improve laws and drive policy implementation by duty bearers who are answerable and face sanctions for implementation failure (accountability).
- **Vertical integration** means trying to identify the power imbalances that cause accountability failures and then seeking to address them through coordinated action, often involving monitoring and oversight at subnational, national and transnational levels.

Executive summary

INTRODUCTION

This is the final report of a learning evaluation of specific areas of the Natural Resource Governance Institute's (NRGI) 2015-2019 strategy.

In 2013, NRGI was established from the merger of the Revenue Watch Institute with the Natural Resource Charter with the principal goal of helping people to realize the benefits of their countries' oil, gas and mineral wealth through applied research and innovative approaches to capacity development, technical advice and advocacy. In 2015, NRGI embarked on its most recent five-year strategy.

The following assumptions inform NRGI's theory of change:¹

- Governments, civil society, media, parliaments, private sector actors, national oil and mining companies hold the power to create change and play unique but complementary roles in natural resource governance.
- Effective communication of evidence and dialogue between government and citizens is critical to building understanding of and buy-in to resource governance policy choices.
- Effective collaboration between parliament and civil society helps hold the executive branch of government accountable, generating incentives and informing policymaking and implementation.
- Media builds public understanding and demand for government accountability in the management and spending of revenue generated from natural resources; working in partnership with civil society and parliaments strengthens their role.
- Policymakers and companies respond to international cues about expectations and desirable practices, and they use domestic policy to signal intentions and improve their reputations abroad.
- While a number of factors affect outcomes (e.g., the domestic political landscape, commodity prices, and the international relations context), in general, improving natural resource governance will increase government revenues that are available to contribute to social policies that will increase benefits for citizens.

The organization's theory of action flows from its theory of change and assumes that improved resource governance is mainly a function of capacity and political will. Put simply, NRGI brings expertise in resource governance to drive evidence-based decision making and work in collaboration with the key actors in the sector. NRGI strives to directly and indirectly build capacity and trigger incentives to accelerate change in the various areas described above. During the 2015 to 2019 strategy period, this theory of action took a three-pronged approach:

1 Natural Resource Governance Institute, *Theory of Change Assumptions*, internal document (Undated).

- promoting accountability norms at the **international level** to drive incentives to enhance natural resource governance. This includes shaping norms and standards, private sector behavior and multi-stakeholder initiatives.
- directly and indirectly, contributing to the capacities of national **governments** who are motivated to improve resource governance. Their motivations can be due to incentives driven by global norms and/or domestic political imperatives (including the use of norms by domestic accountability actors). NNGI assumes that increased capacity will result in better policy adoption and implementation by governments and other actors.
- enabling and collaborating with **accountability actors—agents of change in parliaments, media and CSOs—to provide better oversight**. Enabling the sustainability of movements and multi-stakeholder collective action or collaboration is key to this work. In other words, NNGI assumes its work will directly increase the capacity of these actors to amplify incentives for governments and private sector actors to be more transparent and improve both the collection and management of revenue.

There are elements that are implicit in and mentioned by staff as part of NNGI's approach that the theory of change or its assumptions do not formally codify. For example, although staff talk about, and some programs do confront corruption and deep power structures that prevent citizens from enjoying the benefits of natural resources, these issues are not explicit in NNGI's theory of change or action. Relatedly, though citizens feature primarily as beneficiaries in the theory of change, the theory of change presumes they have agency and act in other ways that complement NNGI's efforts.

EVALUATION SCOPE

In view of the breadth of the strategy, as well as evidence and learning generated by NNGI during its implementation, the evaluation aimed to generate insights on a limited set of issues driving the original strategy to inform NNGI's forthcoming work:

- NNGI's ability to leverage its 'think and do approach' that is the array and combination of typical NNGI interventions. NNGI's 'think' functions include applied research, analysis and data. These approaches inform and are informed by 'do' functions, which include capacity building, technical assistance, policy advocacy and convening.
- The efficacy of NNGI's approaches in contributing to lasting outcomes. NNGI defined these approaches in terms of two separate and discrete sub themes: a) closing policy implementation gaps – a relatively new area of emphasis for NNGI, as well as, b) the efficacy of its work in support of sustainable accountability-seeking institutions.
- NNGI's contribution to the use of extractive sector data (e.g., payment, contract and beneficial ownership data) for natural resource accountability and policy reform. This is an important cross cutting area of work in which NNGI has invested substantial resources over recent years.
- NNGI's success in **leveraging partnerships with international influencers**² to achieve a multiplier effect and increase NNGI's potential reach and impact.

In addition, I considered the implications of evaluation findings for the ongoing evolution of NNGI's theories of change and action.

2 For the purpose of this evaluation, influencers were defined in the evaluation survey sent to staff as organizations that are able to influence extractive debates, policy and norms globally or in one or multiple countries/regions. Typically, they would include international financial institutions (IFIs), regional development banks, donors, multilateral initiatives (e.g., EITI), multi-donor initiatives and large international NGOs.

METHODS AND LIMITATIONS

The ambition of the original evaluation design, which allowed for breadth (survey) and depth (in- country studies) had to be narrowed following NRGi's decision to change the evaluator early in the process. This placed considerable limitations on what the evaluation could achieve.

As the evaluator, I took a mixed methods approach, combining interviews, a review of secondary data, plus analysis of raw data and findings from a survey run by NRGi to interrogate assumptions informing NRGi's work on the four evaluation themes. While the approach to questions on think and do and partnership was quite broad in scope, I used a more in-depth approach to explore the lasting outcomes and data use themes. To be more specific, I focused on a purposive sample³ of countries that promised interesting stories in relation to evaluation questions on data and lasting outcomes. These were Ghana, Guinea, Indonesia, Mexico, Nigeria, Tanzania and Tunisia.

The evaluation also aimed to develop conclusions and recommendations based on learning related to higher-level assumptions in NRGi's theories of action and change to the extent possible. Theory and evidence from the wider transparency, participation, accountability and governance fields informed the analysis.

SUMMARY OF KEY CONCLUSIONS AND RECOMMENDATIONS

Findings from the sample of countries examined support key assumptions in the organization's theory of action:

- *International norms and standards successfully influenced and promoted by NRGi, such as the Extractive Industry Transparency Index (EITI) and the Resource Governance Index (RGI), 'work' in shaping national governments' incentives to engage with policy reform and good practice.* In several instances, this was due to the reputational costs of bad governance as anticipated in NRGi's theory of change. However, domestic political and development imperatives also drive the willingness of governments to engage with global norms. This is somewhat surprising in countries that had recently elected nationalist governments.
- *NRGi's capacity building works to enable national governments to design and implement improved resource governance policy, which leads to increased disclosure and revenue collection in several countries.* These achievements are remarkable given the limited evidence of transparency, participation and accountability (TPA) interventions, particularly in resource governance, going beyond increased transparency.⁴
- *NRGi's capacity building works by enabling accountability-seeking institutions to engage with and/or improve demands for changes in their governments' transparency and accountability behaviors.* The extent to which they are able to use their advocacy skills to incentivize changes in government accountability behavior varies with context. NRGi's work in Ghana provides an interesting example of how such work can shape public discourse on natural resource revenue management, driving domestic incentives for policy implementation.

3 A purposive sample is a non-probability sample that is selected based on characteristics of a population and the objective of the study.

4 Andrew McDevitt. *Transparency and Accountability in Extractive Industries*, (Knowledge Evidence and Learning for development, 2017). gsdrc.org/wp-content/uploads/2017/06/082-Transparency-and-accountability-in-extractive-industries.pdf

The evaluation also provided some evidence on how and why NRGi's theory of action has worked in some of the priority countries studied. The evaluation found that NRGi's approach has tended to work well in pro-reform contexts. This is partly because NRGi has been successful in:

- **delivering its think and do functions in contextually-relevant ways that leverage cross-comparative rigorous knowledge.** Partners engage with NRGi's knowledge and evidence because they trust it and view it to be of better quality than that of comparators. They particularly appreciate NRGi's ability to communicate the relevance of international best practice through practical tools and approaches.
- **convening multi-stakeholder groups and facilitating relationships, reframing objectives when necessary.** Even though national CSO actors were often able to engage their governments directly and independently, these stakeholders acknowledge that NRGi plays a useful role in enabling relationships between different actors interested in natural resource governance. Staff skills in reframing global norms to make them fit national incentives appear to have helped NRGi sustain relationships in spite of shifts in political imperatives in several countries with less conducive reform contexts.
- **increasing its focus on policy implementation for long-term change in program design and delivery.** This was achieved through a two-pronged strategy of direct technical support to government actors as well as work with accountability-seeking institutions. Though each strand has enjoyed some success, NRGi does not always design and implement them in an integrated manner.
- **building the financial and technical capacity of accountability actors to contribute to policy reform and hold governments accountable for implementing reform commitments.** NRGi has made significant and valued contributions to the capacity of several NGO coalitions. However, because coalitions' abilities to play meaningful roles in natural resource transparency and accountability are influenced by their dynamic political contexts and funding opportunities, they can have difficulty sustaining their influence over time.
- **being an effective data intermediary that has been able to enhance government and accountability actors' access to and use of extractive data, increasingly through country-led and problem-driven approaches.** Stakeholders recognize NRGi as playing an important role in collecting, organizing and making data available. Through a process of pilot testing, learning and adaptation, NRGi has also developed promising approaches to capacity development that the organization can replicate during the next strategy period.
- **multiplying the effects of its work through leveraging its access to global influencers.** NRGi has used evidence and its partnerships to effectively influence the policies of the EITI secretariat and the IMF, among other international organizations.

Areas for improvement

Despite NRGi's achievements, the evaluation revealed several weaknesses and challenges, mostly relating to operational issues. Furthermore, as with other actors in the TPA field, NRGi needs to think and work more politically, which has implications for how NRGi conceptualizes and puts into practice its theories of action and change in the future.

Although externally-driven incentives, such as global norms, are influencing government disclosure, evidence suggests that this may represent 'isomorphic mimicry' or 'open washing' in some resource rich countries. In other words, governments may implement disclosure policies to impress external audiences without changing their norms and behaviors regarding their accountability to ordinary citizens. Evidence from the TPA field suggests such open washing is likely in the absence of domestic actors challenging power structures and driving incentives for government actors to become more accountable.⁵ Some NRGi staff and partners raised questions about whether NRGi's theories of action and change adequately reflect this understanding. NRGi is good at responding to high-level political opportunities. However, it is not always as good at supporting vertically-integrated approaches that involve analyzing the power imbalances that cause accountability failures and seeking to address them through coordinated and integrated action with partners at different levels. More specifically, the evaluation made the following recommendations for improvement:

- **Think and work more politically.** NRGi staff agree that the explicit use of political economy and power analysis is uneven across the organization. Therefore, NRGi should aim to be more explicit about how its understandings of power and context inform program design and adaptation in the future.
- **Disaggregate and clarify NRGi's theories of change and action at global and local levels.** It would be helpful for NRGi to distinguish between its theories of how change happens in natural resource governance in the different contexts where it works with its country-specific theories of action.
 - *Theories of change:* During the next strategy period, NRGi should refine its internal organizational level theories of change, particularly at country level. Detailed power analysis that identifies the barriers and drivers to change in accountable natural resource governance at different levels should inform country level theories of change. Such analysis should include an assessment of donors and other actors working on related issues and thus help NRGi to identify its niche and describe its theory of action (elaborated below) in the different places it operates. In addition, NRGi's theories of change should make the role of citizens in demanding accountability and influencing government-spending decisions more explicit and complete.
 - *Theories of action:* NRGi should develop country-level theories of action that make explicit assumptions about how NRGi and/or its partners will contribute to the broader country-level theories of change described above. Each theory of action should elaborate on how NRGi's work builds the capacity and leverages incentives of different actors involved in accountable natural resource governance and, where possible, should support a vertically-integrated approach. Each country-level theory of action should explain the relationships and tactics NRGi will adopt to overcome barriers identified through power analysis. In addition, they should detail how NRGi's direct work and partnership strategy complement the roles of other actors who are also involved in NRGi's theory of change.
- **Clarify the nature of NRGi's relationships with various local partners and complementarity of roles.** The context and political economy analysis described earlier will enable NRGi to define the nature of the relationships that it seeks with different organizations and coalitions. As a result, country level staff should be able to identify key partners and how NRGi can best build their capacity and enhance their influence through technical and political support. This will require assessing the funding that

⁵ Rudiger, *Fiscal Transparency and Accountability Research Note for the Fiscal Futures' Scenario Planning Workshops (March & April 2018)*

is available to these partners and if/how NRGI can complement funds available from other sources. Ideally, potential partners will be involved in discussions that influence NRGI's decisions regarding its partnership approach. Relatedly, NRGI should create and share its local partnership strategy—the outcomes of such deliberations—with the organizations and groups concerned.

- **Develop country-specific data use and capacity development plans.** This is a key component of the work NRGI undertakes to develop country-level theories of action and change. It requires NRGI country program teams to replicate successes in Ghana and Nigeria to map relevant data landscapes, identify and segment different types of data users and uses. The outputs would then inform a data and evidence focused capacity development strategy that is an integral part of NRGI's capacity development plans. The process should also incorporate recommendations made by staff in the evaluation survey, such as assessing the aptitudes and baseline skills of potential users before designing capacity development interventions and materials.
- **Develop a coordinated influencing strategy and plan.** NRGI should define the specific objectives of its engagement with different international institutions and the audiences that may benefit from this multiplier effect. In addition, NRGI must develop organizational systems to enable the effective coordination of inputs to achieve its aims through concerted partnership.

The conclusion section explores these recommendations, along with possible follow up work that aims to further enhance NRGI's successful approaches.

1. Introduction

This is the final report of an evaluation of specific areas of the Natural Resource Governance Institute's (NRGI) 2015-2019 strategy.

In 2013, NRGI was established from the merger of the Revenue Watch Institute with the Natural Resource Charter with the principal goal of helping people to realize the benefits of their countries' oil, gas and mineral wealth through applied research and innovative approaches to capacity development, technical advice and advocacy. NRGI brings expertise in resource governance to drive evidence-based decision-making and work in collaboration with the key actors in the sector. In 2015, NRGI embarked on its most recent five-year strategy, which placed particular emphasis on:⁶

- **Integration** of learning and analytical work. This involves learning from, as well as influencing others, and ensuring country-level research and analysis inform global practice, training and technical advice on advocacy strategies and policy reform.
- **Deeper priority country engagement** based on country selection criteria, context and political economy analysis to identify national level opportunities
- **Strengthening global practice.** A comprehensive approach to the natural resource governance decision chain outlined in the Natural Resource Charter(NRC); yet focusing on core competencies and first-mover issues
- **Bolstering NRGI's empirical base and evidence-driven approach** to dissemination and use of data (open and otherwise) plus rigorous policy analysis to drive advocacy and reform
- **Collective action approaches.** Emphasis on agents of change, partnering with civil society, government, parliament, and media and youth movements; deepening private sector engagement — with understanding of political economy and governance realities
- **Partnerships** at global and country level with 'influencers' to multiply and sustain effects
- **Monitoring, evaluation and learning.** Codifying lessons and results to inform approaches

Five years on, NRGI commissioned an evaluation as one of several activities designed to help it learn and reflect in preparation for the 2020-2025 'strategy refresh.'

6 Natural Resource Governance Institute, *Organizational Presentation* (2018).

1.1 EVALUATION FOCUS

In view of the breadth of the strategy, as well as evidence and learning generated during its implementation, the evaluation sought to generate insights on a limited set of issues that had received less attention:

- NRGi's ability to leverage its **'think and do approach'** that is the array and combination of typical NRGi interventions. NRGi's 'think' functions include applied research, analysis and data. These inform and are informed by 'do' functions, which include capacity building, technical assistance, policy advocacy and convening.
- The efficacy of NRGi's approaches in contributing to **lasting outcomes**. The evaluation defined these in terms of two separate and discrete sub themes: a) closing policy implementation gaps– a relatively new area of emphasis for NRGi, as well as, b) the efficacy of its work in support of sustainable accountability seeking institutions.
- NRGi's contribution to the **use of extractive sector data** (e.g., payment, contract and beneficial ownership data) for natural resource accountability and policy reform. This is an important cross cutting area of work in which NRGi has invested substantial resources over recent years.
- NRGi's success in **leveraging partnerships with international influencers**⁷ to achieve a multiplier effect and increase NRGi's potential reach and impact.

NRGI had identified these themes in a collaborative workshop involving key staff. These themes are key areas of continued relevance to NRGi's next strategy, where an evaluation focus would be most useful to fill evidence gaps and bring fresh external perspectives to complement existing lessons.

1.2 ORGANIZATION OF THE REPORT

The evaluation report starts by defining terms and expanding on NRGi's theories of change and action. In the following section, I describe the evaluation methodology, including any limitations. Next, I include a discussion of findings that speak to key assumptions relating to the evaluation themes above follows. I also consider the implications of the findings in relation to NRGi's theory of action and change, as well as benchmarks in the conclusions. The report ends with a table that summarizes findings, conclusions and recommendations.

7 For the purpose of this evaluation, the evaluation survey sent to staff as defined influencers as organizations that are able to influence extractive debates, policy and norms globally or in one or multiple countries/regions. Typically, they would include international financial institutions (IFIs), regional development banks, donors, multilateral initiatives (e.g., EITI), multi-donor initiatives, large international NGOs etc.

2. NRGi's theories of change and action

This section examines key assumptions in NRGi's theories of change and action.

Theories of change: a note on terminology⁸

- A theory of change (TOC) focuses on assumptions about the dynamics of change in a specific context or process. These are irrespective of any donor-funded projects or programs.
- A theory of action is the operationalization of a broader TOC for a specific program or intervention. It explains causal assumptions on how to construct a program in order to activate and contribute to a TOC. Ideally, an understanding of power relations, obstacles and drivers of change in a particular context informs a theory of action. Importantly it does not necessarily address all elements of an organizations' theory of change. An organization such as NRGi may be only one of many actors contributing to its theory of change.
- Program theories combine elements of TOCs and TOAs

The underpinning of NRGi's strategy is a theory of change that is referred to in internal documents and includes key assumptions about how change in natural resource governance happens.⁹

Summary of NRGi's theory of change assumptions¹⁰

- Governments, civil society, media, parliaments, private sector actors, and national oil and mining companies hold the power to create change and play unique but complementary roles in natural resource governance.
- Effective communication of evidence and dialogue between governments and citizens is critical to building understanding of and buy-in to resource governance policy choices.
- Effective collaboration between parliament and civil society helps hold the executive branch of government accountable, generating incentives and informing policymaking and implementation.
- Media builds public understanding and demand for government accountability in the management and spending of revenue generated from natural resources; their role is strengthened by working in partnership with civil society and parliaments.
- Policymakers and companies respond to international cues about what is expected and desirable practice, and they use domestic policy to signal intentions and improve their reputations abroad.
- While a number of factors affect outcomes (e.g., the domestic political landscape, commodity prices, and the international relations context), in general, improving natural resource governance will increase government revenues that are available to contribute to social policies which will increase benefits for citizens.

8 Adapted from www.theoryofchange.nl/resource/question-6-what-difference-between-theory-change-toc-logframe-and-theory-action-toa

9 Natural Resource Governance Institute, *Theory of Change Assumptions*, internal document (Undated).

10 Natural Resource Governance Institute, *Theory of Change Assumptions*, internal document (Undated).

NRGI's theory of action flows from this TOC, but the organization does not respond to all elements of NRGI's theory of change. For example, NRGI does not undertake work to influence policy or plans on how governments spend resource revenue. The organization leaves this work to other CSOs and coalitions.

NRGI's theory of action assumes that improved resource governance is a matter of capacity and political will. Put simply, a lack of information, evidence, and capacity to use them and a lack of incentives for reform are the biggest obstacles to progress. During the strategy period, NRGI sought to address barriers to accountable resource governance through a three-pronged approach:

- promoting accountability norms at the **international level**: NRGI assumes that these will provide guidance and shape national government and private sector incentives by creating reputational costs associated with bad governance. At the same time, the global push for accountable policy and governance will shore up political will within national contexts for better resource management.
- directly and indirectly contributing to the capacity of national **governments**: usually through engagement with reformers, think tanks and other relevant actors to design and implement effective systems for accountability and governance more broadly, by providing evidence and legal and economic expertise. NRGI assumes that increased capacity will result in better policy adoption and implementation.
- enabling and collaborating with **accountability actors—agents of change in parliaments, media, and CSOs—to provide better oversight** and increase/improve demands and incentives for good resource governance. Enabling the sustainability of movements and collective action is key to this work. NRGI assumes that its work will directly increase the capacity of these actors to amplify incentives for governments to be more accountable. NRGI's conceptualization of collective action relates to joint actions by different stakeholder groups, rather than mass mobilization by citizens and grassroots organizations.

There are elements that are implicit in and mentioned by staff as part of NRGI's approach that its theory of change or its assumptions do not formally codify. For example, although staff talk about, and some programs confront corruption and deep power structures that prevent citizens from enjoying the benefits of natural resources, these issues are not explicit in NRGI's theory of change or action. Relatedly, though citizens feature primarily as beneficiaries in the theory of change, the theory of change also presumes they have agency and act in other ways that complement NRGI's efforts.

During the strategy period, NRGI adopted varied tactics and approaches to implement its theory of action in the different contexts where NRGI works. In several countries, NRGI has had to adapt these tactics during the strategy period in light of shifts in context. NRGI has responded to changes driven by political transitions, including the election of populist nationalist leaders in the United States, Indonesia, Mexico and Tanzania. In some instances, political transitions have influenced civic space and other institutions involved in resource governance. They have also led to more emphasis on resource nationalism, which takes different shapes in the various countries where NRGI works.¹¹ Key influences on resource nationalism include the nature of the resources and where they are in the country, as well as political settlements.¹²

11 Kaisa Toroskainen and Silas Olanog, *Governments, Companies Find a Bit of Common Ground on Resource Nationalism at Indaba*, Natural Resource Governance Institute, 2019). resourcegovernance.org/blog/governments-companies-find-bit-common-ground-resource-nationalism-indaba

12 Anthony Bebbington, Abdul-Gafaru Abdulai, Denise Humphreys Bebbington, Marja Hinfelaar, and Cynthia Sanborn. *Governing Extractive Industries: Politics, Histories, Ideas*. (Oxford University Press, 2018).

3. Evaluation methods and limitations

The evaluation was a limited exercise when compared with the ambitious design initially envisaged by NRGi. The original design included a survey, three deep dives through country case studies designed to study causal pathways and some additional remote interviews.

NRGi brought me on board following a decision in December 2018 to discontinue the partnership with the previous evaluator recruited for this assignment, which had started in October 2018. NRGi's desire to still generate timely findings to inform strategy discussions that were ongoing required a shift towards a light touch approach, without deep dive case studies. This significantly affected what has been possible in the evaluation. The narrower scope reduced opportunities to undertake the kind of case methods that NRGi partners and the wider field are using increasingly to study if, how and why development organizations' theories of action work. This also made it difficult for this study to answer the evaluation questions as initially framed. Additional comments on how these limitations influenced the scope of issues covered under each question are included in the main text.

Given the limited timescale and resources available for the revised evaluation, I began by carrying out a light touch evaluability assessment. This was to confirm that it would be possible to generate insights relating to the evaluation question themes using the proposed combination of internal documents, survey responses, interviews and evidence from the broader field.

The above assessment informed my inputs on a global e-survey as well as a purposive sampling strategy for qualitative informal interviews. Three versions of the survey were sent out to i) NRGi staff, ii) partners and iii) NRGi board, advisory and core donors. Because of time constraints, I conducted interviews concurrently using a purposive sample. I used focus group discussions (FGDs) with members of staff to identify prospective informants that included a range of staff occupying different organizational positions. These FGDs also helped me to identify suitable partners to interview.

Recent evaluation reports gave data and insights that helped to answer the various evaluation questions—particularly on data use, a priority evaluation theme.¹³ Therefore, I used interesting stories relating the other priority question—lasting outcomes—to choose focus countries (Guinea, Ghana, Indonesia, Tunisia, Tanzania and Mexico) and interview respondents.

Several external global respondents were also selected as respondents because of their expertise and understanding of NRGi's 'thinking and doing' or influencing work. However, many partners did not respond to invitations. Hence, I was not able to interview as many of NRGi's partners as I had initially planned.

¹³ Natural Resources Governance Institute, *NRGI Civil Society Assessment* (NRGi, 2018); Leila Kazemi. *Natural Resource Charter: Looking Back to Look Ahead, An Evaluation of Phase II Activity 2012-2015*, (2016).; Engine Room, *NRGI Open Data Lessons Learned Report* (Engine Room, 2018).

A summary of the data collection methods used:

- A document review – see Annex 2 for the list of documents
- Responses from 177 survey respondents
 - 49 program staff
 - 59 partners
 - 9 individuals who represented donors, AC or governing board members
 - 31 informal interviews and 5 FGDs with a sample comprising:
- 23 current/former staff
 - 1 board member
 - 2 global NGO staff
 - 1 member of the EITI International Secretariat
 - 6 CSO partners/local experts (from Guinea, Indonesia, Tanzania (2), Mexico and the Philippines)
 - 6 government respondents (3 from Ghana, 1 from Guinea, 1 from Mexico and 1 from Indonesia)

Informal interactions with two of NRGi's Monitoring, Evaluation and Learning staff, one former NRGi staff and two other individuals working with global NGOs who have engaged with NRGi around learning also informed my thinking and interpretation.

3.1 ANALYTICAL PROCESS

I generated findings by assembling the various data: raw survey responses, analyzed survey responses that quantified data from closed and open questions around the evaluation question themes, data from unstructured interviews, internal documents, and broader evidence from the field.

Perceptions. For questions referring to perceptions on the quality of services, the nature of relationships between NRGi and its partners, and the use of data (EQs one, two and three), I used trends suggested by the quantitative and qualitative analysis of survey data plus data from interviews and my reading of individual survey responses.

Contributions. In instances that demanded an assessment of if, how and why NRGi was contributing to certain changes (mostly evaluation questions two and three), I made efforts to assemble and triangulate evidence using generative methods. I explored the nature of NRGi's contribution to any reported outcomes per its theory of action and how various factors influenced these outcomes in the six aforementioned focus countries. However, the broad scope of the work NRGi has undertaken in these countries meant the methods I used yielded quite fragmented data. Thus, I found contribution assessments challenging. Moreover, it was not possible to undertake a deep analysis on how and why changes had or had not taken place.

Objectivity. I made efforts to triangulate using different methods or data sources at the level of individual examples and findings that are more general. At the level of individual examples, the process was imperfect. Thus, I reverted to Latour's approach to 'objectivity', which derives from allowing those who are being evaluated to "object to what is said about them."¹⁴ In other words, I have tried to respond to various objections arising during presentations of initial findings to the leadership team, evaluation advisory group and NRGi's board. This final draft has also benefitted from additional scrutiny of several staff who know the cases that were the focus of the evaluation well.

¹⁴ David Mosse. *Anti-social anthropology? Objectivity, objection, and the ethnography of public policy and professional communities.* *Journal of the Royal Anthropological Institute* 12, no. 4 (2006): 935-956.

One other limitation arising from the revised evaluation approach is that I could not use objective organizational capacity assessment tools to explore the sustainability of the coalitions and movements supported by NRGIs.¹⁵

Concluding point. None of the limitations mentioned have any bearing on the evaluation's main findings conclusions and recommendations. They are relatively high level and I am confident that the processes of triangulation and discussion of findings with staff mean the evidence presented in this report supports them.

3.2 A NOTE ON EVIDENCE

As NRGIs were keen to benchmark findings against recent literature, I have used evidence from the transparency, participation and accountability (TPA) field in my analysis.

Summary of key points relating to evidence from the field:

- Evidence remains scant on the impact of transparency, participation and accountability (TPA) initiatives.¹⁶
- Weak evidence in the TPA field is due to a tendency for evaluations to focus on compliance with transparency standards without looking at whether these impact accountability.¹⁷
- The evidence that does exist suggests that:
 - While transparency, information and data are important for governments and accountability actors, they are not sufficient to drive reform and its implementation. Citizen participation and deliberation, often involving citizen mobilization and collective action is necessary as well.¹⁸ Incentives driven by external actors and global norms tend to produce partial transparency and may result in 'open washing' or 'institutional isomorphism.' These terms mean that governments seem to adopt 'international best practice' to impress donors, without changing their underlying practices.¹⁹ In other words, they cause implementation gaps.
 - Implementation gaps occur because of dispositional conflict (when implementers reject goals of superiors, which can be due to power structures and political settlements); change in political agendas following political transitions; poor communications of standards within state institutions; or a lack of state capacity.²⁰
- In view of the above, influential policy makers and practitioners working in the TPA field recommend that:
 - Transparency ought to be considered a means, not an end, as a growing number of initiatives suggest that accountable governance is about shifting power relations. Organizations implementing accountability initiatives need to ask themselves the question: transparency and accountability to what end?²¹
 - Strategic, vertically integrated approaches that blend external incentives with domestic, politically-driven incentives are more likely to be effective.²²
 - Collective learning is required to make work more strategic.²³
 - Information and data still play central roles in vertically-integrated approaches, but these are now informed by practitioners' and academics' growing appreciation of factors that increase the uptake of data, technologies and tools. These factors are quality; whether information is shared beyond elites;²⁴ relevance to users' problems;²⁵ and the importance of selecting evidence and presentation approaches appropriate to the capacity and needs of the likely users.²⁶
 - Media has a role to play but there is conflicting evidence on the efficacy of different impact pathways, which are very context dependent. Nevertheless, a comprehensive World Bank study argues that the route by which media influences pro-accountability behavior is through its impact on discourse and voter behavior. The study concludes that media's role in transparency—increasing citizen access to information on the actions of those in government—can foster different forms of political engagement.²⁷
 - The successful uptake of information and data depend on a series of complicated relationships that need to be brokered and mediated to make different kinds of data and evidence relevant and useful for pro-accountability actors.²⁸ In other words, intermediaries play a key role in helping information gain traction.²⁹
 - The extent to which citizens use or generate information to engage with government at different levels is extremely context dependent as is the willingness and capacity of government actors to respond.³⁰
 - There are no magic bullets, but efforts to encourage citizen engagement tend to work better when associated with indigenous institutions and issues of concern to local people.³¹

¹⁵ For examples of organizational assessment tools see www.intrac.org/wp-content/uploads/2017/01/Organisational-assessment-tools.pdf

- 16 Andrew McDevitt. *Transparency and Accountability in Extractive Industries*, (Knowledge Evidence and Learning for development, 2017). gsdrc.org/wp-content/uploads/2017/06/082-Transparency-and-accountability-in-extractive-industries.pdf
- 17 McDevitt, *Transparency and Accountability in Extractive Industries*.
- 18 Francis Rathinam, Priyanka Cardoz, Zeba Siddiqui and Marie Gaarder. *Transparency and Accountability in the Extractives Sector: A Synthesis of What Works and What Does Not*, (International Initiative for Impact Evaluation, Working paper 33, 2019). www.3ieimpact.org/evidence-hub/publications/working-papers/transparency-and-accountability-extractives-sector
- 19 Anja Rudiger. *Fiscal Transparency and Accountability Research Note for the Fiscal Futures' Scenario Planning Workshops (March & April 2018)*, (Carnegie Endowment for International Peace, the International Budget Partnership, the Transparency and Accountability Initiative, 2018). www.internationalbudget.org/publications/state-of-the-field-review-fiscal-transparency-and-accountability/
- 20 Linnea Mills. *Law vs. Practice: A Review of the Implementation Gap*, (Natural Resources Governance Institute, 2019).
- 21 Rudiger, *Fiscal Transparency and Accountability Research Note*
- 22 Several examples of successful integrated approaches to demanding accountability can be found in Joy Acheron and Francis Isaac. *Going Vertical: Civil Society Policy Monitoring and Advocacy in the Philippines*, (Making All Voices Count, 2016). opendocs.ids.ac.uk/opendocs/bitstream/handle/123456789/12718/MAVC_Going_Vertical_FINAL.pdf
- 23 Transparency and Accountability Initiative, *Transparency and Accountability Initiative Strategic Plan, 2017-2019*, (2017), 5. www.transparency-initiative.org/wp-content/uploads/2017/03/tai_report_final_web.pdf
- 24 Rathinam, Cardoz, Siddiqui and Gaarder. *Transparency and Accountability in the Extractives Sector: A Synthesis of What Works and What Does Not*.
- 25 Arguments for user centred design to increase data use have been made by Reboot, *Using Data to Influence Government Decisions*, (2015). reboot.org/wordpress/wp-content/uploads/2015/07/Reboot_Using-Data-to-Influence-Government-Decisions_2015.pdf. These resonate with arguments made by the Doing Development Differently
- 26 See for example, Evans and Goldstein, *8 Lessons on How to Influence Policy*
- 27 Syed Akhtar Mahmood, Meriem Ait Ali Slimane, Brian Levy, Cass Sunstein, Richard Thaler, and Brian Levy. *Making Politics Work for Development: Harnessing Transparency and Citizen Engagement*. (Oxford, UK: World Bank, 2018). www.worldbank.org/en/research/publication/making-politics-work-for-development
- 28 Karen Brock with Rosie McGee. *More Accountable and Responsive Governance: How do Technologies Help Make it Happen?* (Making All Voices Count, 2017) provide useful definitions of infomediation that focuses the specialist processes of analyzing and communicating data which is a distinct type of intermediation.
- 29 Brock with McGee, *More Accountable and Responsive Governance*.
- 30 World Bank, *Engaging Citizens for Better Development Results*, (World Bank, 2019). iegh.worldbankgroup.org/sites/default/files/Data/Evaluation/files/Engaging_Citizens_for_Better_Development_Results_FullReport.pdf
- 31 Dieter Zinnbauer. *Social Accountability-Taking Stock of All the Stock-taking and Some Interesting Avenues for Future Practice and Research*, Available at SSRN 2913597 (2017).

4. Findings

This section outlines findings. In each section, I construct an overall assumption from key points in NRGI’s theory of action that relates to the question’s theme. I then present a headline finding regarding that assumption before proceeding to outline the supporting evidence.

4.1 THINKING AND DOING

Assumptions

Integrating learning and analytical work was a major thrust of the 2015-2019 strategy.³² NRGI assumed that stakeholders would engage with and value its publications, training and technical assistance because of their rigorous evidence base, accessibility, relevance and practical utility. NRGI also assumed that the organization is more effective because it does the think and do, not leaving other actors to do one or the other. According to the strategy, NRGI would learn from and share learning with others around its theory of change. Assumptions included the idea that global norms and practice would influence country level research and analysis and vice versa.

Headline Finding

NRGI plays an important intermediary role in the natural resource governance sector, where it is regarded as a thought leader in the field. Furthermore, NRGI’s research and evidence—‘thinking’—is rated as more rigorous and useful than that of peer organizations and its ability to combine locally-relevant research with international experiences in practical ways motivates a variety of stakeholders to engage with NRGI’s products and services. Evidence products such as the Resource Governance Index (RGI) influence policy adoption; however, not all of NRGI’s thinking and doing is equally valuable or being done well enough.

Evidence

Stakeholders consider NRGI’s research to be of better quality than that of its peers as illustrated in the graph below.³³

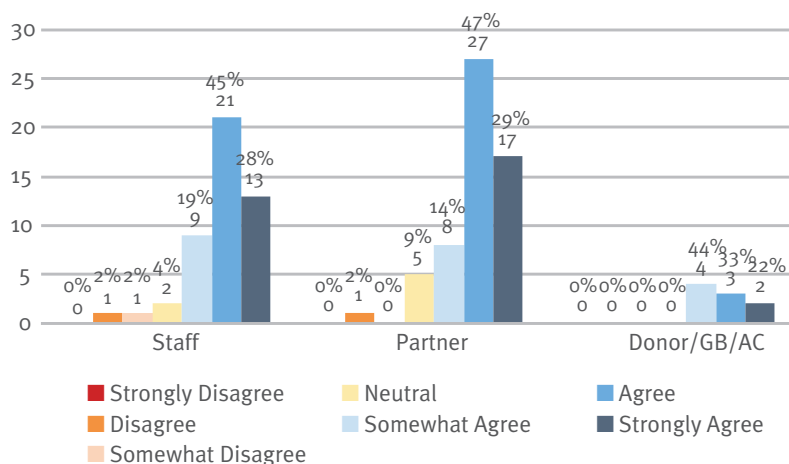


Figure 1. Extent to which NRGI research and analysis is of higher quality than that of other NGOs

³² Natural Resource Governance Institute, *2015-2019 Natural Resource Governance Institute Strategy*, 6.
³³ Analysis of survey responses to question: “To what extent do you agree with the following statements: NRGI produces research and analysis that is of higher quality than that of other NGOs”

Staff,³⁴ partners and its board³⁵ recognize NRGI as a thought leader, and they laud the organization for shining a light on important issues such as beneficial ownership, the myth of transparency undermining competitiveness and commodity pricing among other topics.³⁶ NRGI’s ability to lead the field and produce quality research is central to its legitimacy, reputation, and potential to contribute to more transparent, accountable and effective resource governance.

NRGI’s research and publications are considered more relevant than its competitors³⁷ as illustrated in the survey graph below.

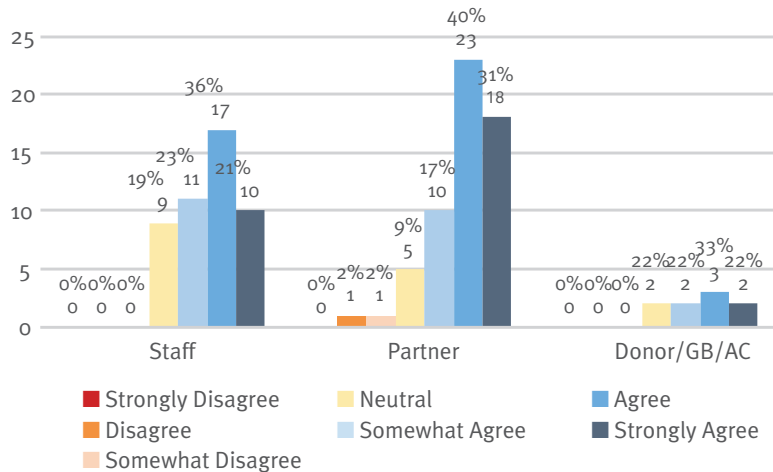


Figure 2. Extent to which respondents agree that NRGI research and analysis better meets their needs than that of other NGOs

Staff respondents find NRGI publications relevant and useful for their context and audiences. Staff cite reasons including the relevance of case studies in global publications to their country work (e.g., in ‘12 Red Flags: Corruption Risks in the Award of Extractives Sector Licenses and Contracts’,³⁸ ‘How Did Fiscal Rules Hold Up in the Commodity Price Crash?’³⁹) and publications’ timeliness and usefulness for diagnosing problems and proposing solutions (e.g., the Resource Governance Index - RGI). In addition, publications increase NRGI’s credibility to work on certain issues, which this evaluation discusses further in section three below.

Staff respondents mentioned comprehensiveness and clarity of message, visuals, digestible length, conciseness, and readability as features of NRGI publications they find useful.

Staff also mentioned a number of publications that were directly applicable to their advocacy, training, analysis or were valuable as talking points in discussions with partners and donors. Staff noted the following as examples of specific uses:

- the ‘Natural Resource Charter’ (NRC) helped frame or diagnose a problem, which was supported by data from an evaluation of the NRC. For instance, staff found the NRC provided a tool for a comprehensive assessment and dialogue on Sierra Leone’s Core Mineral Policy.⁴⁰
- ‘12 Red flags’ and the ‘RGI’ helped to uncover or identify a problem, and set an agenda

34 Analysis of responses to survey question 5.1

35 3 Global CSOs interviews; analysis of responses to survey question 5.3

36 3 Global CSO interviews

37 Analysis of responses to survey questions 1.5 and 1.6. Respondents were asked: “To what extent do you agree with the following statements: NRGI produces research and analysis that meets the needs of policymakers, activists and other practitioners better than that of other NGOs.”

38 Aaron Sayne, Alexandra Gillies and Andrew Watkins. *12 Red Flags: Corruption Risks in the Award of Extractive Sector Licenses and Contracts* (Natural Resource Governance Institute, 2017).

39 David Mihalyi and Liliana Fernández. *How Did Fiscal Rules Hold Up in the Commodity Price Crash?* (Natural Resource Governance Institute, 2018).

40 Kazemi, *Natural Resource Charter: Looking Back to Look Ahead*, 30 & 32.

- ‘12 Red flags’ and ‘*Political Parties and Natural Resource Governance: A Practical Guide for Developing Resource Policy Positions*’⁴¹ provided solutions, messages and toolkits that increased staff members’ credibility and confidence to speak on issues and to address identified problems.
- NRGi data platforms/tools like resourcecontracts.org, resourceprojects.org, fiscal tools, and the RGI data explorer and RGI questionnaires informed staff work. Staff mentioned that they **resort to these tools to generate updated analysis over time**, with sustained effects on their work. (These platforms are referred to again under EQ three.)

NRGI’s most current research and evidence informs most of NRGi’s capacity development.

NRGI’s 2018 Learning Needs Assessment found that most of NRGi’s training deliverables integrate NRGi thinking and this constantly evolves. This means NRGi’s training resources frequently expose participants to new research related to policy decisions.⁴²

NRGI combines high quality research that is relevant to local advocacy and policy needs together with international experience; NRGi’s capacity building and technical assistance are highly valued by partners. 45/54 (84 percent) respondents answering the question on the quality of outputs and services thought NRGi’s technical advice was good or very good and 45/45 (89 percent) rated its training similarly.⁴³ (The percent of those who had attended training or received technical advice rated these services slightly higher-training 32/33 (97 percent)⁴⁴ and technical advice 29/32 (91 percent).⁴⁵ Several staff and partners think NRGi’s ability to combine international experience with local issues is its niche.⁴⁶

The Resource Governance Index (RGI) is probably the best example of NRGi leveraging its thinking and doing function, while playing an important intermediary role. The Index opens doors for discussions and provides governments with incentives to improve their performance, though it does have limitations.

41 *Political Parties and Natural Resource Governance: A Practical Guide for Developing Resource Policy Positions*, (National Resources Governance Institute, 2018).

42 NRGi, *Learning Needs Assessment* (2018) 9.

43 Analysis of responses to survey question 1.5.1

44 Analysis of responses to survey question 1.6.2

45 Analysis of responses to survey question 1.6.5

46 3 NRGi staff interviews, 2 government partner interviews, 9 partner survey responses question 5.3

The Resource Governance Index (RGI)

This Index reports high quality evidence on the state of transparency in resource governance in the form of a comparative index. The RGI can be used for benchmarking, measuring implementation gaps and thus also as an advocacy tool. 19 staff and 19 partners (20 percent) of all survey respondents chose the index as their top NRG publication.⁴⁷ By triangulating survey responses with interview responses and data in reports, I identified examples of the RGI prompting some sort of action on the part of governments in Ghana, Indonesia, Nigeria, Guinea, Tunisia, Tanzania, Mongolia and Mexico.⁴⁸ The RGI was also used as one of several key indicators by DFID to assess: Ghana Oil and Gas for Inclusive Growth's (GOGIG) contribution to improved natural resource governance.⁴⁹ In several instances, NRG staff or partners found the RGI a useful advocacy tool that gave them a foot in the door—governments were eager for technical assistance to improve their RGI scores.

In some cases, the international comparison with other countries (covered by the RGI) was particularly useful for helping to diagnose and identify a problem to support staff and partner advocacy. This corresponds with evidence from the field that suggests international indices work through peer pressure mechanisms that motivate governments to do better.⁵⁰ The accepted wisdom, however—as NRG's experience in Guinea shows with the government's reaction after the 2017 release—is that poor performance needs careful handling and framing to mitigate tensions in relationships.⁵¹

High scores can cause problems too. A CSO partner was critical that a high score in a country where corruption is endemic, may undermine anti-corruption advocacy. This highlights a weakness of global norms being operationalized through comparative transparency indices, mentioned earlier. They can provide governments' motivation for open washing or isomorphic mimicry and have little corresponding impact on accountability behaviors in the absence of domestic incentives.

Moreover, respondents in Ghana and Mexico described the RGI as too academic and top down to be a useful and relevant tool for work with citizens. This is consistent with findings from on-going evaluations of the Open Budget Survey (OBS) tool and Index.⁵² Many civil society actors working on budget transparency at subnational level struggle to make national level messages relevant to local communities. Moreover, in the case of Mexico, the RGI does not cover areas of interest to them such as problems with the extractivist model as well as social and environmental impacts.⁵³

The evaluation found examples of regional or country work influencing global practice and NRG learning from others. NRG teams in Latin America have influenced NRG's global thinking and doing around environmental and social sustainability issues.⁵⁴ In addition, internal think pieces indicate learning from others in the field. For example, a report on Supreme Audit Institutions refers to the International Budget Partnership's work in this area,⁵⁵ and the recent literature review on the 'implementation gap' features a discussion of Global Integrity's work.⁵⁶

47 Analysis of responses to survey question 1.1

48 Example of Nigeria press story comparing Ghana performance on the RGI with Nigeria –allafrica.com/stories/201809040014.html; In Mongolia RGI influenced SOE transparency; in Ghana, Mexico and Mongolia it influenced policy making on revenue management influenced (NRGI End of Year Review 2017).

49 DFID, *2017 Annual Review of: Ghana Oil and Gas for Inclusive Growth (GOGIG)* accessed from DFID tracker 31st May 2019.

50 For example, see evaluations of the Open Budget Survey

51 The Guinean Government was initially disappointed with its performance on the RGI, but an internal champion was able to use Guinea's RGI score for internal advocacy which later led to NRG providing additional technical assistance to help the government improve. This is further unpacked under evaluation question two.

52 Author's experience evaluating the OBS

53 NRG staff comment on draft report

54 NRG staff interviews and FGDs

55 Natural Resource Governance Institute, *The Role of SAIs in Resource Governance*, (Internal briefing, 2019).

56 Mills, *Law vs. Practice: A Review of the Implementation Gap*

NRGI has established an impressive monitoring system with the potential to feed organizational learning and thinking.⁵⁷ The organization publishes useful case studies of its work regularly on the website, though I will turn to issues of quality below.

Areas needing improvement

NRGI's thinking and doing approach works, however not all of its thinking and doing is considered equally valuable. Respondents raised issues that suggest NRGI may not always think or do the right things, or do things well enough.

NRGI tends to prioritize rigorous research (thinking) over the accessibility and potential utility of doing products.⁵⁸ This is of concern to staff who believe governments' lack of access and capacity to use data and evidence are not the biggest obstacles to accountable resource governance. In their opinions, NRGI should put more emphasis on products that are accessible to ordinary citizens as well.

NRGI could do more to capitalize on the potential of its global convening work. Staff rated policy advocacy, capacity development and technical advice positively; but global staff thought NRGI could further leverage global events to increase its influence and profile.⁵⁹

There are opportunities to enhance the learning function. Staff recognize the achievements of NRGI's small Monitoring Evaluation and Learning (MEL) team, which was only created in July 2017. However, the MEL team, and a couple of partners are keen for NRGI to further improve the quality of its learning and evaluation products, which are not on a par with comparable organizations.⁶⁰ NRGI has not always used innovative evaluation designs and approaches, such as process tracing and contribution analysis. These techniques have gained increased prominence through application by other INGOs in recent years. This is partly due to the inexperience of external evaluators, but may also relate to the commissioning of such projects. In addition, one respondent noted that NRGI's internally-produced impact stories do not live up to expectations and fail to tease out the contribution of NRGI versus other actors.⁶¹ The organization could address several of these issues through more conscious use of evaluation approaches that include more deliberate use of contribution analysis thinking.

Some partners who are active in TPA learning spaces commented that NRGI had not been very involved in 'doing' work that involves sharing lessons related to its theory of change.⁶² This view requires nuanced interpretation. NRGI has been an active participant in some important learning initiatives in the field, such as around the Open Government Partnership (OGP).⁶³ However, because NRGI tends to frame its work slightly different from many other actors in the TPA field, some senior staff felt that these spaces were not particularly useful.⁶⁴ An ongoing collaboration with the International Budget Partnership and Oxfam that provides more opportunity for the three organizations to align and discuss conceptual frameworks used for learning should help to address this.⁶⁵

57 Several staff commented on this in interviews and author's expert opinion having reviewed various outputs and components of the system during the 6 months of my engagement with NRGI.

58 NRGI staff interview, analysis of survey responses

59 Survey responses to question 1.9 on suggestion to improve services

60 Informal discussions with MEL team members, author's expert opinion

61 My review of impact stories, NRGI interview, individual survey response to question 1.4 on the characteristics of least useful publications.

62 Informal discussions with 2 global civil society partners

63 NRGI staff comment on draft

64 NRGI staff comment on draft

65 NRGI's involvement in this project is discussed in an IBP blog, Brendan Halloran, Suvarna Hulawale, International Budget Partnership; Caroline Laroche, Natural Resource Governance Institute; And Chris Stalker, Oxfam America. *Sharing Insights On Strategy and Learning for Fiscal Justice*. (The International Budget Partnership, 2019). www.internationalbudget.org/2019/04/sharing-insights-on-strategy-and-learning-for-fiscal-justice/

NRGI's thinking and doing is too broad in scope.⁶⁶ Staff raised concerns that NRGi tries to lead in areas where it does not have comparative advantage, such as gender; that too broad a scope can undermine the timely delivery of strategic research,⁶⁷ and NRGi's ability to focus persistently on closing the 'implementation gap.'⁶⁸ There was some disagreement among staff regarding the reasons for this. Some cited general shifts in global and local, including donor trends.⁶⁹ Others argued they had been the innovators, starting to work on issues like climate change because donors had been too slow.⁷⁰ Regardless of disagreements over causes, there does seem to be agreement that broad scope is a problem. Despite this, survey responses, particularly from staff, suggest NRGi is mindful that it will need to make its thinking work relevant to the climate emergency, and partners' growing interest in renewable energy.⁷¹

A few people thought NRGi's focus on transparency is too great and that this might be a risk to its continued relevance. They argued for NRGi to accelerate a shift of focus from transparency to also tackling, in an integrated way, accountability and effectiveness of policies across the decision chain, including how they result in tangible revenue gains.⁷²

4.2 LASTING OUTCOMES

Assumptions

NRGI's ability to achieve lasting outcomes depends largely on context. The assumption is that once governments decide to respond to global norms or domestic incentives, they will welcome NRGi's support in developing their capacity to adopt and implement reforms. According to the evidence described earlier and NRGi's theory of action, lasting outcomes, particularly closing implementation gaps, require relevant actors in government to develop the necessary capacities as well as to support sustainable coalitions and other accountability institutions that can then monitor reform implementation. Therefore, the potential for NRGi to achieve lasting outcomes increases when NRGi takes an integrated approach to programming work relating to implementation gaps and coalition building. Prospects for success may also increase if staff have a common understanding of what lasting outcomes are and prioritize them in their practice. In addition, staff need to be acquainted with and consider the risks of negative outcomes associated with this kind of work.

Methodology note: the design of the evaluation suggests that NRGi conceptualizes and programs its policy implementation and coalition work separately, rather than use a vertically integrated program framework. This, plus other methodological limitations associated with cancelling the deep dive case studies, meant the evaluation questions and approach generated quite fragmented data. To the extent it was useful, I generated stories and case notes as evidence to support high-level findings presented in this section. These appear in the Annexes to this report. Readers should consider these case notes as data points; they are not rigorous case studies of NRGi's contribution to sustainable change. For example, these notes hardly mention the role of NRGi's work with parliaments. In addition, it is impossible to say how representative these examples are of NRGi's broader portfolio, as that was never the intention of this exercise that mainly sought to generate insights for learning.

66 Analysis of responses to survey questions 2.15, 5.2, 5.4, 5.5

67 NRGi staff interview

68 NRGi staff FGD

69 NRGi staff interview

70 Staff comment on draft report

71 Analysis of responses to survey questions 5.4

72 This point triangulates with a finding from the *NRGI Civil Society Assessment survey* emailed in a personal communication from NRGi staff: 59% of respondents recognized transparency as CSOs most significant impact in recent years, but only 16% thought it would be the most important area in the future. 29% favored revenue management instead; Analysis of responses to survey questions 1.9, 5.2.5

Headline Finding

Staff members vary in their vision and definition for lasting outcomes. Despite this, they self-report a general increase in attention to work on the implementation gap and support for the development of coalitions and institutions over the strategy period. Though staff say that some organizational systems can undermine lasting outcomes, the new focus on these lasting outcomes has led to some important breakthroughs. NRGi has been able to leverage government incentives—often triggered by the global norms it promotes—and provide capacity support for policy reform and implementation, particularly in reform-friendly environments. Some of these examples go beyond transparency and involve the implementation of policies on revenue collection, which, given the lack of comparable evidence, may be of wider interest to the TPA field. There is also evidence staff have been somewhat effective in reframing norms on responsible natural resource governance in response to changing and more nationalistic political imperatives.

In some instances, NRGi has built the technical and financial capacity of coalitions or institutions that are supporting policy implementation. While this reinforces findings on the quality of NRGi's services discussed above, some evaluation data indicates that building sustainable institutions is challenging. Moreover, NRGi lacks a consistent approach to analyzing contexts and deciding how to approach coalition-building work.

Staff have fairly limited consideration of the potential negative effects of working on resource governance issues that global norms mainly influence.

Evidence

NRGI has invested considerable effort in learning about how its approaches and tactics can contribute to more lasting outcomes. Most recently, NRGi has commissioned two pieces of work to make it more effective in these endeavors. One internal think piece has already yielded important ideas on how to increase the participation of supreme audit institutions concerning EITI compliance, as well as Supreme Audit Institutions monitoring and using data disclosed through EITI in their audit work.⁷³ Another literature review unpacks existing knowledge about the reasons for implementation gaps.

Staff in different parts of the organization have varied understandings of what lasting outcomes mean. Survey responses show that 19/44 (43 percent) of staff who answered this question mentioned behavioral change of local stakeholders. This was associated with NRGi's capacity building of government or accountability-seeking actors. 5/44 (11 percent) specifically mentioned the importance of building the capacity of demand side actors. 19/44 (43 percent) of staff provided answers about policy being adopted and implemented with some of these adding points about implementation leading to impact and/or preventing a roll back once achieved. NRGi putting itself out of a job was another theme.⁷⁴

Different views on lasting outcomes may partly reflect different backgrounds, roles or assumptions on how change happens. Staff working in different areas of NRGi come from different disciplinary and professional backgrounds appropriate to their roles. Some staff and external respondents interviewed believe that NRGi can achieve the most lasting impact through politically informed, yet quite technical insider capacity-building work, and that this should be its focus.⁷⁵ This involves NRGi directly or indirectly, building capacity of reformers to use evidence to change formal rules and laws to close the implementation gap. Others are of the opinion that a lack of evidence or government capacity and policy are not the main problems actors must address. Their responses suggest they believe that achieving sustainable outcomes involves enabling accountability-seeking actors to take actions to shift power structures and informal institutions. In their opinions, these are necessary steps to ensuring ordinary citizens' influence and benefit from natural resource

73 Natural Resources Governance Institute, *The role of SAIs in Resource Governance* (Natural Resource Governance Institute, internal briefing, 2019). Mills, Law vs. Practice: A Review of the Implementation Gap

74 Analysis of responses to survey questions 2.1

75 NRGi staff and Global Civil Society partner interviews

revenues.⁷⁶ At a senior management level, NRGi understands the need for change in both areas. However, its theory of change does not elaborate its assumptions concerning the need for shifts in deep power structures. Moreover, its theory of action is not explicit about the extent to which NRGi supports work in this area as opposed to leaving it to other actors.

Staff report they are focusing more on lasting outcomes than they were three years ago. Although the relative emphasis staff put on various lasting outcomes is likely to differ according to their roles, graphs of survey responses below suggest that overall, NRGi’s staff are putting more emphasis on coalition capacity building and policy implementation than they did three years ago.⁷⁷

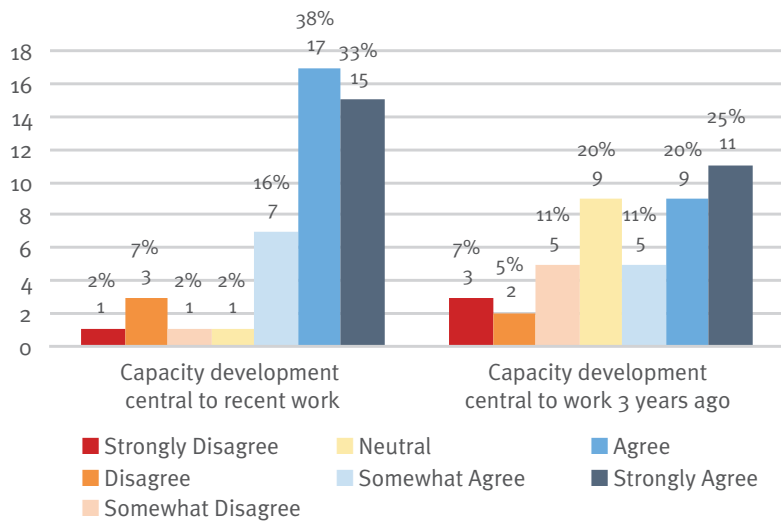


Figure 3. Staff views on centrality of capacity building of local actors currently and three years ago

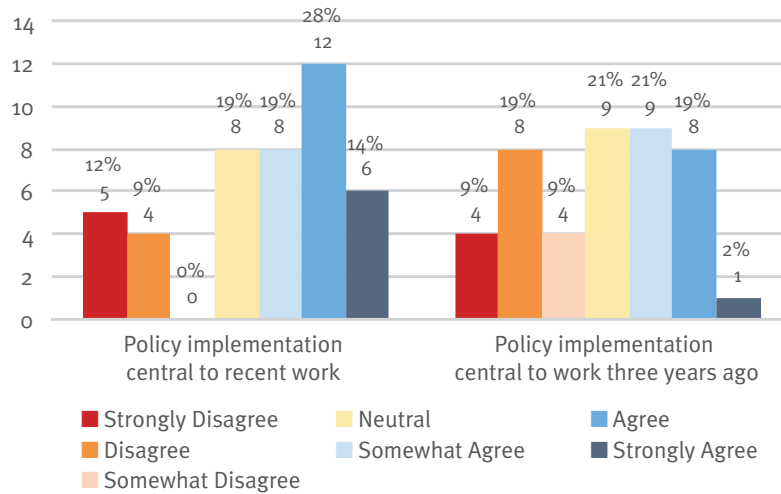


Figure 4. Staff views on centrality of implementing policy currently and three years ago

76 This was articulated in different ways. One person in Latin America noted that a new emphasis on policy meant the country team was no longer able to program its work according to its former theory of change. This had worked on deep power structures through enabling communities to develop alternative narratives on extractives. Another, from Mexico, recommended that NRGi adopt a rights based approach. One respondent in Ghana mentioned that change in Africa comes about by actions of people rather than governments. Another made reference to a lack of data not being the main barrier to change. One person noted NRGi spent too much time worrying about academic rigor and not enough on how to make its information accessible to ordinary people.

77 Evaluation survey. Staff were asked: “To what extent do you agree with the following statements: Building the capacity of local actors to promote and influence policy reform is central to my recent work Building the capacity of local actors to promote and influence policy reform was central to my work 3 years ago Helping implement policy that has been previously adopted is central to my recent work Helping implement policy that has been previously adopted was central to my work 3 years ago”

Staff reported the principal barriers to them supporting lasting outcomes are mainly operational, with the most commonly mentioned relating to planning cycles. 16/39 (41 percent) of staff who answered this question mentioned at least one of the following: poor internal communications, lack of knowledge management, MEL systems, NRGi/donors favoring short-term projects, the slowness of decision making/bureaucracy, the quality of human resources and finance support detracting from core programmatic responsibilities, poor appreciation for the importance of and approach to strengthening project management.⁷⁸ Still, the most commonly-referenced issue was planning cycles. 11/39 (28 percent) of staff remarked on this with one-year planning cycles preventing sustained investment and limiting adaptability and responsiveness to emerging issues being their top two concerns. Similar numbers, 28 percent of staff respondents noted a mismatch between NRGi's ambition and resources. Others commented on high staff turnover and suboptimal collaboration between different programmatic departments.

A few responses spoke to more strategic issues including, a mismatch between global norms and local priorities; a lack of strategic thinking, for example in NRGi's choices of strategic partners.

Despite staff identifying challenges to NRGi supporting lasting outcomes, partners think NRGi initiatives support lasting change. 51/53, (96 percent) of partners responding to a general question on sustainability believe NRGi has contributed to changes that will be sustained over time. 26/49, (53 percent) of respondents answering sub questions mentioned lasting improvements in capacity; 12/49, (24 percent) lasting improvements in trust and relationships; and 11/49, (22 percent) policy reform.⁷⁹ The next few sub sections take a deeper look at some specific examples relating to policy implementation and the sustainability of coalitions and other accountability-seeking actors that NRGi has supported.

4.2.1 IMPLEMENTATION GAP⁸⁰

Assumptions

Closing implementation gaps requires relevant actors in government influenced and incentivized by global norms or their own development agendas to develop the necessary technical, coordination and communication capacities. This also requires building the capacity of sustainable coalitions and other accountability institutions that can then monitor reform implementation. It follows that the potential for NRGi to achieve lasting outcomes increases when NRGi takes an integrated approach to programming work relating to implementation gaps and coalition building.

Headline Finding

NRGi is able to take advantage of reform-friendly environments and leverage internal and/or external incentives to contribute to policy implementation in resource governance systems. These outcomes have involved NRGi's direct or indirect support to governments in the development of regulations and consensus building. In several examples, there are direct links to NRGi's work on building the capacity of accountability actors and other institutions that play roles in closing implementation gaps. However, this work is not always as integrated with NRGi's technical assistance to ministries as it might be.

Evidence

Monitoring data suggest that NRGi has contributed to changes in systems of governance that are central to policy implementation in 12 countries, as well as several examples at the global level. NRGi's outcome database includes examples of policy implementation in the Democratic Republic of the Congo, Ghana, Guinea, Lebanon, Mexico, Mongolia, Myanmar, Nigeria, the Philippines, Tunisia and Uganda.

⁷⁸ Analysis of responses to survey question 2.3

⁷⁹ Analysis of responses to survey questions, 2.4 and 2.5

⁸⁰ This section mainly focuses on Ghana, Guinea, Tunisia and Mexico,

Global examples involve the International Monetary Fund (IMF), several large global corporations and commodity traders. The UK Anti-Corruption Summit succeeded in getting commodity training transparency reporting on the global agenda and this resulted in improved corporate reporting among other things.⁸¹ NRGi has also influenced the EITI Secretariat, which this evaluation discusses under question four.⁸²

Most cases describe government implementation of transparency commitments, for example publishing contracts and other disclosures. Several reflect NRGi's success in encouraging State-Owned Enterprises to be more transparent. The database includes examples from the DRC, Tunisia, Mongolia, Ghana, Nigeria and Mexico.⁸³

A few policy implementation examples go beyond transparency; some could lead to increased government revenue. NRGi has played an important part in enabling governments to adopt and implement policies for revenue collection in Nigeria, the DRC, Myanmar, Ghana and Guinea.⁸⁴ In some instances, accountability actors supported by NRGi have played key oversight roles that have helped to close gaps and forced a government response. For example, the DRC's 'Plateforme des Organisations de la société civile intervenant dans le secteur Minier' (POM) carried out an assessment of the DRC EITI, resulting in an audit that exposed the mismanagement of budget funds. This subsequently led to the replacement of the National Coordinator and reform of DRC's EITI's practices.⁸⁵ In Ghana, monitoring by the Public Interest and Accountability Committee (PIAC), a citizen-led independent statutory accountability body, identified leakages from a national oil company, spurring public debate on fiscal rules and parliamentary engagement on discussions around legitimate spending by the state-owned enterprise (SOE). PIAC, in its formative years, was nurtured and hosted by NRGi with funding support from the United Kingdom's Department for International Development (DFID) and other donors. The institution currently receives statutory funding support from government out of the Annual Budget Funding Amount (ABFA).⁸⁶

Data on the nature of NRGi's contribution has not been triangulated in all cases, and information on the quality of implementation is sometimes lacking. However, given the relative lack of evidence of CSO-led accountability demands going beyond transparency compliance mentioned earlier, these two cases appear to be important examples. NRGi's role is not to monitor how this money is spent, but it might be worth exploring if providing this information to partners who work on budget monitoring would be useful.

NRGi staff were able to build capacity of governments to achieve implementation by taking advantage of opportunities to leverage incentives in several of the pro-reform contexts that received greater attention during the evaluation. In Guinea, Tunisia, Mexico and Ghana, high-level political interest in being (or appearing to be) transparent meant technocrat reformers were open to NRGi's offer of technical assistance. The case notes in the Annexes drill a little deeper into the processes that led to implementation and the factors that drove them, which this section summarizes only briefly. The relative quality of evidence for different cases presented in the Annexes are presented as footnotes below.

- In Guinea, NRGi used its long-standing relationship with the Alpha Conde government that secured NRGi a position as a technical adviser within the Ministry of Mines to leverage international incentives and global norms, as well as donor resources and build capacity. This influencing and capacity-building work resulted in the implementation of a wide range of transparency and revenue collection policies. By the end of the strategy period, NRGi had contributed to the implementation of:⁸⁷

81 Staff comment on draft report

82 NRGi outcomes database

83 NRGi outcomes database

84 NRGi outcomes database

85 NRGi outcomes database

86 NRGi outcomes database

87 Quality of evidence of NRGi contribution: medium. Most data from NRGi outcomes database, triangulated in exchanges with NRGi staff, who have reviewed evidence of outcomes. I was not able to triangulate outcomes during interviews with Guinea partners, but did triangulate the value of NRGi's insider role contributing to behavior change in the Ministry and some of the drivers of change.

- A Ministry of Mines website implemented in 2013 (and then updated in 2018) that includes detailed information and mining resource contracts. (NRGI provided technical assistance and IMF scrutiny created additional incentive).
 - The development and implementation of a mining code both attractive to investors and with strong tax provisions, as well as transparency and enforcement measures. Mining investment has picked up since 2016 and tax collection increased from 2.2 to 2.9% of gross national product between 2016 and 2017 according to the country's latest EITI report.⁸⁸ (NRGI provided technical advice.)
 - The state-owned enterprise, SOGUIPAMI, implemented recommendations to increase transparency after achieving a low score on the RGI. (NRGI provided technical advice.)
 - Financial modelling that is reported to have become part of everyday practice enabled the Ministry of Mines to routinely discuss investors' assumptions in feasibility studies and push back on unreasonable demands for tax incentives.
- In Tunisia, NRGI capitalized on its convening power, insider relationships with staff in the Ministry of Energy and Mines and two SOEs, Compagnie de Phosphate de Gafsa CPG and ETAP the main oil company, as well as financial and technical support to local civil society advocacy coalitions.⁸⁹ This enabled a multi-stakeholder group, particularly a local civil society coalition, to use a collaborative approach to leverage global norms and standards, such as the EITI and OGP. Together they were able to help the government respond to incentives driven by international donors demanding improvements in government transparency. The release of the 2017 RGI, which proved a useful benchmarking and advocacy tool, provided additional impetus, and the government and SOEs achieved the implementation of several transparency policies, including:
 - CGP and ETAP disclosing phosphate and oil revenues
 - the Ministry of Energy implementing EITI disclosure on oil contracts plus comprehensive disaggregated data on royalties and taxes

These achievements are remarkable given the volatile political context in Tunisia and that the CSO coalition built on spontaneous youth protest about environmental effects of mining and a lack of employment opportunities, which is unusual in aid-supported programs. That said, there are suggestions that some of the actions by government could be examples of isomorphic mimicry rather than genuine shift towards more accountable resource governance.

- In Mexico, NRGI helped the National Hydrocarbons Commission (CNH) respond to international and domestic incentives and publish all details of contract management, including the allocation of resources to the national oil company Petróleos Mexicanos, PEMEX.⁹⁰ CNH and NRGI also converged around the idea of setting up an independent CSO monitoring group composed of known CSOs in the extractives field such as Fundar to monitor publication and prevent the government from only making the commitments to save face. In other words, they wanted to mitigate the risks of open washing.

88 Cowater-Sogema, Independent Validator, *Guinea's EITI Validation Report – zero draft* (2018) eti.org/sites/default/files/documents/validation_report_country_guinea_zero_draft.pdf

89 Quality of evidence of NRGI contribution: good. The outcome data came from the NRGI outcomes database, but the story of the development of the coalition and shift of government behavior came from a good case study, Alexander Martin, *Policy Reform for Increased Transparency, Accountability and Good Governance in the Tunisian Extractive Industries*, (Issam Fares Institute for Public Policy and International Affairs, 2018). (www.academia.edu/37150885/Policy_Reform_for_increased_Transparency_accountability_and_Good_Governance_in_the_Tunisian_Extractive_Industries) that triangulated and deepened NRGI's internal accounts such as Natural Resource Governance Institute, Impact Study: *Civil Society Playing a Key Role in Extractive Sector in Once-Autocratic Tunisia*, (Natural Resources Governance Institute, 2018). resourcegovernance.org/analysis-tools/publications/nrgi-impact-civil-society-tunisia).

90 Quality of evidence of NRGI contribution: good. Interviews with staff, partners and survey responses all triangulate on implementation achievements, though there are different opinions on whether outcomes will last.

- In Ghana, NRGi and its partners, including the Africa Center for Energy Policy (ACEP), contributed to the implementation of transparency commitments contained within the 2018 National Petroleum Regulations.⁹¹ A key feature of this legal reform process is the transition from an “open door” (direct negotiation) license allocation process to the competitive bidding process that is now being implemented. Their patient, yet persistent approach, which began in 2008, included leveraging interactions and capacity-building events, such as NRGi organized summer schools. The NRGi Ghana team enabled two consecutive administrations, which both faced domestic- and internationally-driven incentives for reform, to improve implementation and sustainability. A visit from peers in Mexico and Lebanon supported by NRGi and the Open Contracting Partnership were noted as particularly effective, as were NRGi’s critical comments on draft legislation.
- The case study did not ascertain the extent to which the government’s efforts to access credit lines from the IMF may have contributed to their willingness to work with NRGi, though these were ongoing at the time. However, according to NRGi, the commitment to transparency of international companies such as Kosmos Energy and Tullow Oil helped. The case thus illustrates how NRGi’s multi-stakeholder approach works and that civil society actors as well as the Public Interest Accountability Interest Committee (PIAC), who have been supported by DFID and NRGi, are effective in monitoring government transparency and revenue. Part of the efficacy of their approach is using media and freedom of information requests effectively to stimulate public debate and create incentives for government to respond.

NRGi and its partners have used technical, relational and convening competencies to leverage various internal and external incentives, including global norms in different contexts to achieve implementation. Relationships with champions who can overcome some of the barriers to implementation, such as dispositional conflict and poor communication within ministries, helped in each of the four contexts mentioned above.

There are no examples of policy implementation from two of the evaluation focus countries, Indonesia and Tanzania, which underwent political transitions. However, NRGi has been able to adapt its approach, sustain relationships and contribute to policy internalization and adoption. In Indonesia, the country program is not working consciously on closing the implementation gap yet, given the dominant focus on advancing pending legal reforms first.⁹² Nonetheless, NRGi is contributing to the government’s implementation of Beneficial Ownership legislation.⁹³

The evaluation design did not enable rigorous comparisons of reasons for barriers to implementation in different contexts; however, the change in government has made Tanzania a much more difficult environment in which an international NGO like NRGi to work. Following the election, NRGi could not sustain technical assistance in areas of fiscal rules and revenue management as it had previously.⁹⁴ However, according to DFID, NRGi was able to adapt strategically, maintaining its focus on generating high-quality analysis as a means to nurture and sustain relationships with reformers.⁹⁵ This has included seeking opportunities to re-engage the government and parliament around setting appropriate tax levels.⁹⁶

91 Quality of evidence of NRGi contribution: good. Staff and external partners accounts triangulated on NRGi’s contribution to implementation.

92 NRGi staff interview

93 NRGi staff comment on draft report

94 NRGi staff interview

95 DFID, 2018 Annual Review Releasing the Transformational Potential of Extractives for Economic Development (RTPEED), (DFID, 2018).

96 Thomas Scurfield and Silas Olan’g. *Magufuli Seeks Right Balance for Tanzania’s Fiscal Mining Regime*, (Natural Resources Governance Institute, 2019). resourcegovernance.org/blog/magufuli-seeks-right-balance-tanzania-mining-fiscal

4.2.2 SUSTAINABLE MOVEMENTS AND INSTITUTIONS⁹⁷

Assumptions

Natural resource governance requires strong, coordinated coalitions with the technical and financial capacity to use evidence to inform public debate and advocate for more transparency and accountability. NRGi enables accountability-seeking actors to develop the capacity they need to leverage incentives driven by international norms or domestic politics and advocate for policy change. NRGi's tactics also equip these actors with the skills required for oversight of government policy implementation. Effective coalitions supported by NRGi will be able to attract the funding they need to sustain their work.

Headline Finding

NRGi has helped strengthen the technical and financial capacity of accountability-seeking institutions in several countries, some of which have been able to use evidence and international norms and standards to increase access to and gain credibility with their governments as a result. On occasion, these coalitions have played a role in closing implementation gaps and support from NRGi has enabled some of these coalitions to access additional funding for this work. Yet, the examples studied demonstrate the risks of assuming that this means they have achieved technical or financial sustainability. Relatedly, NRGi's responsibilities to partners are too ambiguous, especially regarding funding.

Evidence

NRGi made important financial and technical contributions to the capacity of accountability seeking institutions before and during the 2014-2019 strategy in Ghana, Guinea, Tunisia, Tanzania, Mexico and Indonesia. Each case is a good example of the capacity that can be built (or contributed to) in the context of long-term relationships.

- *NRGi's long-term support for civil society in Guinea has contributed to improvements in the technical capacities of CSOs to leverage international norms and influence public debate.*⁹⁸ NRGi had faced challenges in its efforts to support CS coalitions in Guinea.⁹⁹ As a response, NRGi decided to seek new partnerships, including with a group of young journalists. According to an Action Mines representative, financial and technical support from NRGi during the strategy period has increased their understanding of the sector and made them more confident engaging government and leveraging the EITI. They have then been able to pass on some of this knowledge in their journalistic work with communities, and as a result, these communities are more aware of what they are entitled to and prepared to monitor government or company obligations. This is a remarkable change in a country where, as recently as 2007, discussions about natural resources were taboo.¹⁰⁰ While the Action Mines representative acknowledged that their capacity had grown, he said it was nascent and that they still need technical and financial support from NRGi. Moreover, NRGi's international identity enables them to gain quicker access to the government.

97 This section focuses on support to partners in Ghana, Guinea, Indonesia, Tanzania, Tunisia and Mexico,

98 Quality of evidence of NRGi contribution: good. Accounts from NRGi staff as well as the *NRGi Civil Society Assessment*, 16 were critical of the lack of achievements prior to engagement with Action Mines. Accounts from the Action Mines representative and senior NRGi staff triangulated.

99 Guinea case study from *NRGi Civil Society Assessment*, 16

100 Interviews NRGi staff, CSO partner

- *NRGI has played an important role in enabling a grassroots-initiated PWYP coalition in Tunisia (referred to earlier) to leverage international standards and influence government policy.*¹⁰¹ This coalition is now able to use evidence-based research and global standards such as the RGI to engage and influence government with collaborative as well as adversarial tactics (reported above and in detailed case notes (Annex 2)).¹⁰² Put simply, it can play both insider (capacity-building) and outsider (accountability-seeking) roles in a context where government is incentivized to undertake reform but prone to open washing. NRGI's contribution consisted of financial grants, training and technical advice on research and advocacy tactics as well as brokering relationships within multi-stakeholder groups. Despite having developed considerable capacity, members of the coalition still depend on NRGI for financial support.¹⁰³
- *In Mexico, NRGI's financial support and direct work with government made it easier for Fundar to access CNH and oversee its implementation of the contract disclosure policy mentioned above. However, staff suggested that a change in the level and nature of funding has made the relationship more complex and marked a shift in emphasis in respect of NRGI Mexico's theory of change.* NRGI provided Fundar, a major CSO partner with core funding of \$65,000 per annum from 2014 to 2017, \$45,000 in 2018; the amount to be granted in 2019 is expected to decline further.¹⁰⁴ This reduction occurred when NRGI had to rely on core funds to support its work in Mexico and thus began playing a more direct, insider role, providing direct services to CNH. As Fundar has multiple donors, this was unlikely to affect its sustainability. According to one respondent, however, this shift in financing and roles reflects a change in NRGI's theory of change and partnership model, which could lead to Fundar rejecting future funding. In effect, NRGI has shifted its approach in Mexico from a solidarity-based partnership approach in which it used core funding to support CSO partners and citizens in creating a narrative around extractives that challenged deep power structures to a greater focus on formal policy and systems.
- *NRGI has contributed to the technical and financial capacity of PIAC, an innovative accountability institution in Ghana that is performing an oversight role and stimulating public discourse on corruption. PIAC is now financially and mostly technically independent.* NRGI's support enabled PIAC to complete several reports raising issues with parliament, the Ministry of Finance and corporations, and contributing to public debate on corruption. Additionally, and importantly concerning sustainability, NRGI and other civil society actors were successful in advocating for the government to allocate funds for PIAC's operations. Influencing government budget allocations appears to be a success in terms of NRGI nurturing an indigenous accountability institution that has been able to diversify its funding base and disclose information to the public. However, current and former staff have different views on the extent to which PIAC's funding from government will help or hinder its ability to mitigate corruption. On the one hand, PIAC has been able to stimulate public debate on the issue and staff have also signed an MOU with the Economic and Organized Crime Office to further leverage its findings in their criminal investigations. On the other hand, according to a former staff member, the power of PIAC to challenge vested interests and structural constraints is limited.

¹⁰¹ Quality of evidence of NRGI contribution: good. The outcome data came from the NRGI outcomes database, but the story of the development of the coalition and shift of government behavior came from a good case study, Martin, *Policy Reform for Increased Transparency, Accountability and Good Governance in the Tunisian Extractive Industries*.

¹⁰² Martin, *Policy Reform for Increased Transparency, Accountability and Good Governance in the Tunisian Extractive Industries*.

¹⁰³ Interview NRGI staff

¹⁰⁴ NRGI Grant report 2014-2017, NRGI staff interview

- *Hakirasilimali a Tanzanian (PWYP) CSO coalition was able to use the technical and institutional capacity developed through its prior relationship with NRGi to leverage funding from other sources and engage with government.*¹⁰⁵ Hakirasilimali was able to comment on the 2015 Petroleum Law, the 2015 Revenue Management Law, and a bill centering on Tanzania’s entry to the EITI during the strategy period. These achievements built on the significant technical and advocacy capacity the coalition developed with support from NRGi prior to 2014. Such capacity helped ‘Hakirasilimali’ attract funding and technical assistance from Swiss Development Cooperation (SDC) and Oxfam, reducing dependency on NRGi during the 2014-2019 strategy. Despite having developed significant technical capacity and legitimacy with government, Hakirasilimali, would still like to engage in regional learning activities facilitated by NRGi in the future. Moreover, a senior member of the coalition noted that NRGi was doing a good job in capacity building and increasing the effectiveness of media actors in Tanzania and that this should continue.
- *In Indonesia, NRGi and the PWYP secretariat played complementary roles, which partly reflected the success of NRGi’s previous contributions to PWYP’s financial and technical capacity.*¹⁰⁶ PWYP and NRGi have distinct, but synergistic roles. NRGi works on building the capacity of government directly and with the support of Indonesian academic institutions who also play an insider role. In contrast, PWYP plays more of a research and advocacy accountability seeking ‘outsider’ role. If NRGi wants to engage with government actors at a sub-national level, PWYP facilitates the necessary links. In return, PWYP staff are invited to NRGi events and receive some mentoring.¹⁰⁷ One respondent said NRGi and PWYP roles are well coordinated. However, another NRGi staff member questioned this.¹⁰⁸ A broader discussion of NRGi’s relationships with different actors in Indonesia can be found below. It notes that PWYP members may require financial assistance again as the financial environment in Indonesia has become more challenging.

NRGI is supportive, but it needs to be more consultative and consider partners’ roles:

Results from this survey,¹⁰⁹ and a recent capacity development assessment indicate CSO partners value their relationships with NRGi. 46/54 (85 percent) of partners who answered the question believe NRGi contributes to lasting capacity.¹¹⁰ One could argue that because of the power relations between CSO partners and NRGi, these responses might be positively biased. However, my impression—from discussions with CSO partners and others who also provided constructive critical feedback—is that NRGi’s national level coalition partners have truly benefited from their relationships with NRGi.

105 Quality of evidence on NRGi contribution: medium. Evidence relating to the establishment of the coalition from NRGi case studies was triangulated in interview with Policy Forum representative, however it is classified as medium as I did not speak to any other members.

106 Quality of evidence on NRGi contribution good. Even though there was some disagreement over coordination and communication, NRGi and its partner provided consistent accounts of the nature of the relationship and NRGi’s support

107 Interview NRGi staff

108 Interview NRGi staff

109 Partners were asked: “To what extent do you agree with the following statements: NRGi takes away opportunities from my organization; NRGi has influenced the positions of my organization; NRGi helps my organization promote/achieve policy change in resource governance. The data presented are only for national civil society partners.

110 *NRGI Civil Society Assessment*, 8

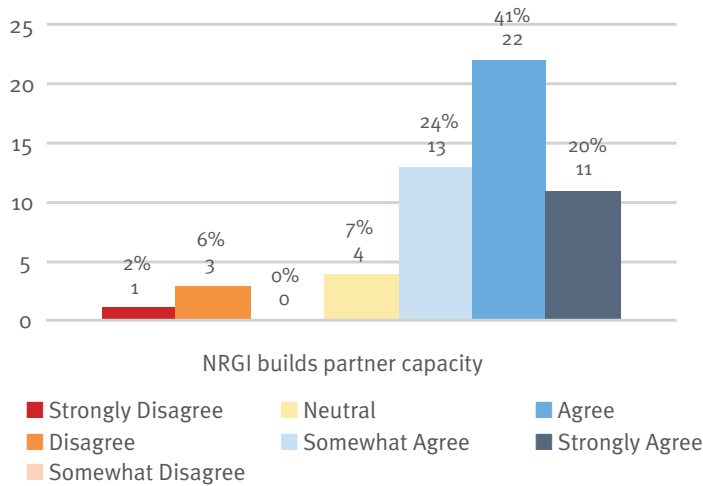


Figure 5. Partners' views on NRGi capacity building

CSO partners think that NRGi's work is well or better coordinated with local groups than other INGOs. A 2018 survey on NRGi's civil society capacity development found 21 of 41 (51 percent) partners in priority countries who responded strongly agreed or agreed with the statement that 'NRGi is well coordinated' while only 9 of 41 responded similarly for other INGOs (22 percent).¹¹¹ This perception of coordination, was strongest from those respondents working at international NGOs and weakest for those from community-based organizations (CBOs) or faith-based organizations. That said, a small number of CSO partners that participated in the 2019 evaluation survey and interviews raised concerns that NRGi might be taking opportunities away from them.¹¹² Though the numbers are small, they still merit unpacking because the issue has not historically received much interest from staff. This is possibly because trying to understand feedback relating to NRGi depriving partners of opportunities involves multiple power relations between different actors; NRGi's position in local accountability eco systems further complicates these relations. It is possible that NRGi's position as a competitor in some locations may lead the organization to take away opportunities from partners, and its position as a donor may mean that responses from partners are positively biased and understate that trend.

Experience from Indonesia suggests NRGi needs to engage in further learning about the conditions under which it can pass on its 'doing' function and do itself out of a job. Despite PWYP finding the relationship satisfactory, several interviewees and survey respondents from think tanks suggested that NRGi was depriving them of opportunities. An exploration of perceptions highlights the challenges facing NRGi as it tries to do itself out of a job.

¹¹¹ NRGi Civil Society Assessment, 8

¹¹² 10% of the 131 online respondents to the civil society assessment agreed or strongly agreed with the statement *Sometimes NRGi takes away opportunities from civil society in my country*". As for the evaluation survey, this amounted to 18% but the total sample is much lower (17 respondents overall for that question) and subject to wider margins of error.

The challenges associated with NRGI doing itself out of a job

As well as building the capacity of accountability seeking actors like PWYP to advocate for and oversee policy implementation, NRGI's 'doing work' also aims to enable local think tanks to take over its direct technical assistance role and support governments in policy analysis. Experience in Indonesia suggests this may be difficult not only because NRGI and its partners' perceptions of their readiness differ, but also because governments desire long-term direct relationships with an independent, international institution that can help them respond to new global norms and standards.

NRGI has had a good relationship with the government of Indonesia for several years. Initially, it was able to leverage the EITI and OGP to provide assistance to a government that wanted to do well on the world stage. In 2015, country program staff successfully reframed this work to appeal to the new administration's more nationalistic, but developmental agenda.¹¹³ Hence, Bappenas, the Ministry of National Development Planning government developed an memorandum of understanding (MOU) with NRGI that is consistent with their domestic anti-corruption agenda. Though national development is a priority, Bappenas also wants to perform well on the EITI. According to a Bappenas representative, this is likely to be a long-term relationship as the Ministry will require ongoing support responding to new global norms, such as Beneficial Ownership, as they arise. While NRGI is an international organization and not an obvious choice for a nationalistic government, its independent advice and non-imposing style makes NRGI's work valued.¹¹⁴

NRGI does not have a consistent approach to partnerships and partner sustainability; it needs one because financial sustainability is fluid over time. The Tunisian and Guinean coalitions are still nascent and require NRGI's financial support.¹¹⁵ In contrast, PWYP Tanzania, Hakirasilimali, PWYP Indonesia, and PIAC in Ghana have all achieved a certain level of maturity and have been operating in contexts where they are able to access money from alternative sources.¹¹⁶ Yet, even when they have graduated from NRGI as a principal funder, partners need ongoing follow up, mentoring and financial support. Partners in Indonesia and Ghana report that their funding environments have changed and are becoming more difficult for CSO actors. This raises strategic questions on what role NRGI should play in enabling partners to access financial support at different times and in different contexts. While the graduation of a CSO partner to new funder relationships may be an important indicator of their legitimacy and relevance to current donor and INGO priorities, NRGI should not interpret this as an indicator of long-term financial sustainability.

There is ambiguity with respect to NRGI's financial role and responsibilities to CSO partners. Evidence presented earlier and in the 2018 CSO assessment illustrates that NRGI has established different approaches to grant making in different locations. This is to be expected and depends on the donor context and NRGI's capacity, among other factors. However, the uncertainty this fuels causes consternation. A CSO respondent from Indonesia recommended that NRGI clearly communicate its funding strategy as members currently face a challenging funding environment. According to one staff member, CSOs in Tunisia are more concerned about future funding from NRGI to sustain their work than political uncertainty.¹¹⁷ Comments from staff in Latin America also suggested uncertainty about NRGI's role is an ongoing issue for partners.

Communication and coordination with PWYP require attention. NRGI's relationship with the PWYP Secretariat tended to work well at the global level, despite some tensions. However, the quality of country-level relationships with PWYP country coalitions has been mixed.¹¹⁸ Reasons vary according to context. They include coordinators being located in different locations,¹¹⁹ coalition mismanagement and ineffectiveness,¹²⁰ and older PWYP

113 NRGI staff interview

114 Government partner interview

115 NRGI staff and partner interviews

116 Partner interviews and NRGI outcomes database

117 NRGI staff interview

118 Global CSO partner interview

119 Global CSO partner interview

120 Senior NRGI staff comment on draft

activists taking confrontational approaches in some countries.¹²¹ A couple of people also referred to examples of NRGIs failing to consult/communicate effectively with country coalitions, which can give the impression it is treading on PWYP's toes.¹²² NRGIs could address this through making the assessment of the pros and cons of working with PWYP coalitions more explicit in its country context analysis and communicating this to relevant members and staff of PWYP coalitions.

4.2.3 NEGATIVE OUTCOMES

Few staff or partners reported negative outcomes in relation to their work.¹²³ This may reflect that there are none, or merely that staff have not been encouraged to think about the issue. Those mentioned include:

- Learning from the breakdown in relationships with the Guinean government following the publication of the RGI, as discussed earlier
- NRGIs' ambiguous identity, taking financial or other opportunities away from local CSOs which staff feel may make some partners feel undermined
- Getting involved in areas outside of its expertise (e.g., gender) that respondents feel would have been best left to others
- Expanding the implementation gap through advocating for an ever-expanding set of global norms.

It is surprising that so few staff commented on the risks associated with vested interests pushing back after civil society gains, or activists being harassed as a result of using sensitive data for monitoring policy implementation. These are well documented in the literature,¹²⁴ and have been experienced by partners in Tunisia.¹²⁵

Similarly, there was no reference to risks arising from 'open washing' or 'isomorphic mimicry' that can shore up authoritarian regimes, even though this issue is widely recognized by practitioners in the field.

*"Many interviewees are concerned about unintended negative consequences of fiscal T/A initiatives designed as apolitical tools. They perceive the risk of transparency interventions "putting a more open face on an unjust and unaccountable status quo." Such "open-washing" can legitimize undemocratic governments and reinforce existing power dynamics. Examples include technical projects such as open data portals that can be used for any political purpose, and global commitments or rankings that are prone to misrepresentation by governments...In India, for example, fears are growing that the force of transparency unleashed by the RTI movement is being reversed and pointed at citizens, with the government collecting data on people, rather than helping people access government data. Many of these concerns reflect the challenges of operating in a more authoritarian climate, along with questions this raises about the political nature of demands for openness."*¹²⁶

121 Global CSO interview, NRGIs staff interview

122 Global CSO partner, Board member interview

123 Analysis of responses to survey question 2.15 on negative unintended consequences

124 2 Global NGO partners, 1 Board member, 1 CSO national partner interviews

125 resourcegovernance.org/blog/tunisia-activist-details-civil-society-progress-speed-youth

126 Rudiger, *Fiscal Transparency and Accountability Research Note*, 19.

The lack of discussion of negative outcomes is consistent with an organization that surprisingly talks very little about power. This is not because staff do not think and work politically, but because they do not talk about it for fear it contradicts NRGi's neutral stance.¹²⁷ Moreover, NRGi is not considering power and motives explicitly enough in its assessments, which is a particular concern in relation to private sector work.¹²⁸ This needs noting and benchmarking. In other organizations that take a 'thinking and working politically approach,' discussions on such issues are becoming part of everyday staff conversations. This is because they play an important role in learning and adaptation. NRGi needs to follow suit and develop an internal culture that constantly considers political interests and power.

4.3 DATA

Assumptions

A lack of access and the capacity to use trusted, quality data related to resource governance are the main barriers to use in evidence-based oversight, accountability and reform. This lack of use is a principal barrier to enhanced resource governance and management. Following from this is the assumption that key NRGi staff are able to analyze different stakeholder needs and respond directly or indirectly: by organizing and increasing access to raw data from NRGi platforms; by building capacity to use them; or by playing an intermediary role and supplying partners with synthesized data and/or customized platforms.

Headline Finding

Over the last five years, NRGi has played useful intermediary roles, supporting experimentation and learning on increasing the uptake and use of data for oversight and policy reform. NRGi has increased access to data. Through searching for data, negotiating access, organizing, supporting capacity development and acting as an intermediary, NRGi has contributed to increased capacity, uptake and use by some partners and staff. In some instances, this has led to data use that has influenced policy and practice. As initial approaches were solution driven, paying inadequate attention to different user needs or aptitudes, overall results have been a little disappointing. However, important lessons have been learned and recent problem-driven experiments with focal country staff playing lead roles are proving more effective.

The evaluation raises questions on whether the emphasis placed on data use as a special sort of evidence that followed NRGi's successful efforts to influence disclosure is still relevant. It may cause confusion and create the idea that working with data is different/more difficult than other approaches to evidence.

Evidence

NRGi has massively increased access to data on extractives through developing, managing and curating four significant data platforms.¹²⁹ These are:

- **Resource contracts:** a repository of over 2,000 publicly available oil, gas, and mining contracts from 93 countries¹³⁰
- **Resource projects:** a repository of data on payments by nearly 800 companies involved in mining or oil and gas extraction in 154 countries¹³¹
- **Resource data:** a repository of various data related to extractive industries and resource governance
- NRGi also generates, analyses and publishes the **Resource Governance Index:** a repository of the data and analysis for the 2017 RGI.

127 Comments on draft from a senior staff member

128 Comments on draft from a senior staff member

129 Note that NRGi's National Oil Company database was not launched at the time of this evaluation.

130 Accessed 13.06.2019

131 Accessed 13.06.2019

Platform visits are increasing rapidly year on year:¹³²

- **Resource contracts:** 89,162 visits in 2018, a 43 percent increase compared with 2017
- **Resource projects:** 8,250 visits in 2018, a 96 percent increase compared with 2017
- **Resource data:** 75,050 visits in 2018, a 346 percent increase compared with 2017

Sophisticated users appear to find the platforms and data useful and are helping to legitimize them through various citations. Partners, such as Global Witness and Transparency International have referred to NRGi platforms or used data in critical advocacy reports, such as Global Witnesses’ Finding the Missing Millions: A handbook for using extractive companies’ revenue disclosures to hold governments and industry to account.¹³³ Major donors such as the EC have also referred to RGI, resourceprojects.org and resourcecontracts.org in a policy review of country-by-country reporting requirements for extractive and logging industries.¹³⁴ The RGI has been cited in 10 academic publications.¹³⁵ (All mentions here relate to monitoring data from 2018 only. More were registered in previous years).

Many staff report that they are aware of the platforms and use them, yet serious barriers to use still exist. Quantitative data from the survey shows that awareness of data and data platforms is good and has increased. However, staff’s awareness of resourceprojects.org and resourcedata.org is relatively low according to NRGi’s high internal standards.¹³⁶ Only 40/49 staff (82 percent) were aware of the availability of these two platforms and sources of data.

23/23 (100 percent) of partners who had used NRGi’s data tools said the quality of tools is good or very good.¹³⁷ Moreover, several staff mentioned that resourcecontracts.org, resourceprojects.org, fiscal tools, the RGI data explorer and the RGI help them perform analysis to inform their work.¹³⁸ A considerable number of survey respondents (over 50 percent in all categories) reported having used NRGi data platforms more than twice and found data that was relevant for their work.¹³⁹

The above data needs to be interpreted with care, however, and viewed alongside answers to questions on barriers to data use. A considerable number of staff and partners commented that their capacity to analyze data; and/or the data formats; and/or completeness prevent them using it.¹⁴⁰

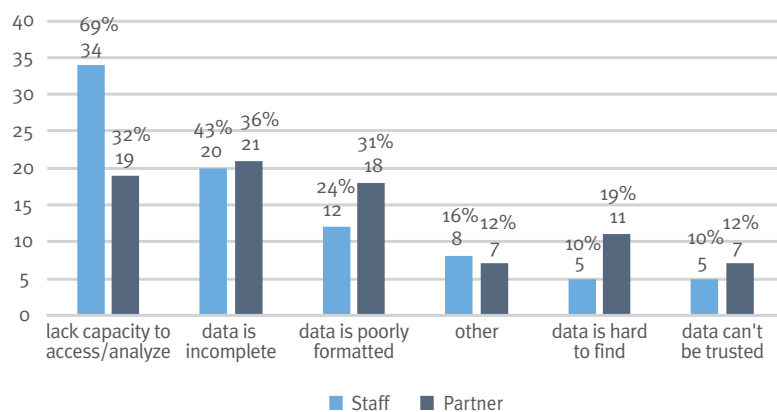


Figure 6. Staff and partners views on barriers to data use

132 Analytics from NRGi 2018 monitoring data

133 Analytics from NRGi 2018 monitoring data

134 Analytics from NRGi 2018 monitoring data

135 Analytics from NRGi 2018 monitoring data

136 NRGi staff interview

137 Analysis of responses to survey question 1.6.3

138 Analysis of responses survey question 1.2

139 Analysis of responses to survey question 3.4.3

140 Analysis of responses to survey question 3.10

In addition, several staff and some partners who use data regularly, e.g., staff from the global teams and a civil society respondent from Indonesia do not find NRGI data platforms very useful. Some staff suggest the data could be made more useful through additional organization and curation.¹⁴¹

NRGI's intermediation, including the customization of platforms, is contributing to increased uptake. Findings relating to the Resource Governance Index, the most highly rated of all NRGI products, provide compelling evidence of NRGI's capacity to collect, transform, organize, intermediate and present data in formats that encourage uptake. NRGI has intermediated and helped governments and other partners develop country-specific resource contract portals that enhance their local relevance and utility.¹⁴² For example, NRGI supported and trained CSOs and the government in DRC to use a local resourcecontracts.org portal to engage on issues of contract disclosure. This led to a vast volume of local traffic to the Metakol copper contract and Kamoia copper projects in DRC, which each generated more than a thousand page views since September 2017.¹⁴³ Remarkably, 90 percent of the visitors were based in eastern DRC. Even though NRGI does not know much about reasons for this interest and use, the case demonstrates that specially-curated platforms and content do drive uptake, or at least interest.

In Mongolia, partners have used NRGI data to establish a contracts database that has been used by PWYP to monitor the implementation of local contracts. Another example is a customized platform using resource projects data in Nigeria, which is described in more detail below. In addition, a School of Data fellow, working under the coaching and guidance of NRGI staff and School of Data, established a platform that contextualized data on the jade industry in Myanmar. However, a lack of resources has prevented the data stories content being developed and published as planned.¹⁴⁴ This raises age-old questions concerning the sustainability of portals developed under short-term aid-funded projects.¹⁴⁵

Some partners report increased capacity to use data as a result of capacity building supported or delivered by NRGI. The case study from Tunisia concludes that NRGI had increased the technical capacity of journalists and CSOs to use data.¹⁴⁶ Similarly, journalists and CSOs report that NRGI training helped them with their work. The Nigerian journalists attributed their ability to follow the Malibu oil scandal to NRGI's training, though some would have liked additional mentoring.¹⁴⁷ Other journalists from Tunisia, Uganda, and Myanmar have used skills to analyze data, and officials trained in modelling have used data in negotiations.¹⁴⁸ Impressive data skills demonstrated by the DRC CSOs trained by NRGI helped them gain credibility with the government.¹⁴⁹ In addition, the PWYP Data Extractor (PWYP DE) program supported by NRGI was fairly effective for participants who were data enthusiasts, but it did not work for everyone.¹⁵⁰

Some of the solution- or supply-driven capacity-building approaches NRGI used or supported to build capacity struggled to increase uptake in any meaningful way. Weak assumptions about uptake thwarted NRGI's initial efforts to make data available on platforms.¹⁵¹ NRGI's 2018 learning needs assessment suggests that they were not informed by an assessment of ability or interest in the data.¹⁵² Availability, accessibility and quality are often cited as the main barriers to data use. However, evidence from the broader field and examples from the '*PWYP Data Extractors Evaluation Report*'; from Engine Room's assessment of NRGI's open data work; and from the recent evaluation survey indicate

141 Interviews 2 NRGI staff

142 NRGI outcomes database

143 Google analytics data supplied by staff

144 openjadedata.org and comments from Director of data projects

145 The risks of short term projects leading to duplicative portals was also raised in an unpublished My Society, *Extracting Value* report (2017.)

146 Martin, *Policy Reform for Increased Transparency, Accountability and Good Governance in the Tunisian Extractive Industries*

147 Engine Room, *NRGI Open Data Lessons Learned Report*.

148 Author's analysis of survey data

149 Engine Room, *NRGI Open Data Lessons Learned*, 27.

150 Cathy Shutt. *PWYP Data Extractors Evaluation Report* (Publish What You Pay, 2019).

151 NRGI staff FGD

152 NRGI, *Learning Needs Assessment* (Natural Resources Governance Institute, 2018), 6.

that relevance both to professional context and aptitudes is more important.¹⁵³ Supply, or data-driven approaches to capacity building that do not consider user needs, capacity and professional contextual relevance seldom work. In fact, NRGi's attempts to drive data use in this way caused tensions between staff in different offices.¹⁵⁴ The data-driven approach has made some global team members feel they were imposing on country staff, pushing people who did not want to use open data to do so. This was sometimes described in terms of power relations between offices in the North and resource rich countries in the South with some select country staff in describing NRGi's open data work coming from a northern point of view, rather than being informed by local needs and realities.¹⁵⁵

NRGI has learned from early experiments, developed improved capacity-building frameworks and trialed some user driven approaches that have been more successful in increasing data uptake by immediate partners. Following the 2018 Learning Needs Assessment, the Capacity Development (CD) team planned to encourage staff to invest more in understanding participants' needs.¹⁵⁶ NRGi also developed a more sophisticated framework that suggests two routes to capacity building and uptake. The first path is data driven and starts with a mapping of existing data, potential users and uses. This segments users and illustrates that different types of users—enablers, data analysts, data intermediaries and thought leaders—will have different capacity building needs. The second path is problem driven and describes a process for seeking data to address an existing problem.

Lessons included in the Engine Room assessment describe how CD staff used relationships and knowledge of colleagues' needs to find appropriate means to trigger interest, build capacity and uptake. This illustrates the benefits of blending the two pathways (above).

Another successful example was identified in the PWYP evaluation of a project by a Fellow from the NRGi-supported School of Data project in Myanmar.¹⁵⁷ The Fellow analyzed the different needs of government technocrats, MPs, journalists and CSOs before coming up with a customized platform and data solution. His approach was more effective than another Fellow's on Cote D'Ivoire because he used the data use needs analysis to build relationships and facilitate a multi-stakeholder buy in.¹⁵⁸

School of Data approach identifies incentives and encourages effective intermediation¹⁵⁹

In Myanmar, the School of Data Fellow took a particularly politically savvy approach to assessing the data use needs of different actors involved in the governance of Myanmar's Jade industry. This allowed him to identify and capitalize on the incentives of different actors, as well as develop the relationships needed to effectively serve as an intermediary between them.

Those working for the government wanted to comply with senior government directives to improve transparency, while MPs were keen to understand the data better. On the demand side, CSOs and journalists were motivated by the prospect of accessing more information to hold the government to account. They also wanted to be part of a project that provided an opportunity to show what Myanmar, a country that has been cut off from the world for many years, could do with technology, and the database designed by the fellow fulfilled this aspiration. It combined visualization tools, stories and data for the different users.

¹⁵³ Engine Room, *NRGI Open Data Lessons Learned*, 13 and 33.; analysis of responses to survey question 3.12; Shutt, *PWYP Data Extractors Evaluation Report*, 5.

¹⁵⁴ Engine Room, *NRGI Open Data Lessons Learned*.

¹⁵⁵ Engine Room, *NRGI Open Data Lessons Learned* April 2018 Draft.

¹⁵⁶ NRGi, *Learning Needs Assessment*.

¹⁵⁷ Shutt, *PWYP Data Extractors Evaluation Report*, 15.

¹⁵⁸ Shutt, *PWYP Data Extractors Evaluation Report*, 15.

¹⁵⁹ Shutt, *PWYP Data Extractors Evaluation Report*, 15.

A recent experiment to increase the uptake of mandatory disclosure data in Ghana and Nigeria provides another example of the efficacy of this use-driven approach and the value of country staff playing leading roles in such projects. Both projects in Ghana and Nigeria (described at length in Annex 4) proved the hypothesis that if NRGi country staff analyze user needs and then intermediate to show potential users applications that address their existing problems, uptake is likely.

In both cases, partners who were introduced to examples of data use cases immediately understood the relevance of the data to their on-going work. NGOs attending both briefings saw community level applications. They wanted to increase community awareness of local government receipts from mining companies that were intended for local development projects so that communities could use the data to monitor government income, expenditure and project implementation. In both instances, the NGOs could see potential links between this community level monitoring or auditing and the work of the Supreme Audit Institution. In other words, they understood that these kinds of projects provide opportunities to test models of vertical integration.

These relationships have continued to bear fruit. The Paradigm Leadership Support Initiative in Nigeria (PLSI) has established a platform resourcebenefits.ng, drawing on payment-to-governments data collected, standardized and presented on Resourceprojects.org. PLSI has also been successful in generating funds under an anti-corruption program that will sensitize different stakeholders to this data using a combination of television shows, policy briefs, infographics and training.

In Ghana, NRGi is collaborating with Oxfam and has participated in workshops with CSOs and community-based organizations to establish how their accountability work can use this data. They are currently firming up plans that include possibly engaging with chiefs in the western region and monitoring the payments for infrastructure payments when companies have stated their intentions to support such investments. NRGi is expected to play an intermediation role in helping communities analyze relevant data.

Going forward, it is important NRGi keeps monitoring the success of these initiatives, since evidence about citizens finding such platforms appropriate, accessible and relevant to their needs is thin. It is also important to follow up on the use of data by the SAI and Mineral Commission in Ghana.

NRGi triggers interest by the Ghana SAI and Mineral Commission

In Ghana, representatives of the SAI and Mineral Commission who also attended the launch of NRGi's data-driven briefing, also immediately understood the advantage of mandatory disclosure data that is released long before government data for auditing government royalty receipts. As government audits have to be completed nine months after the end of the fiscal year, they need such data as soon as possible. Often, government data is released too late.

Following this meeting, NRGi staff members were invited to speak at the working group on extractive industries of the international organization of Supreme Audit Institutions. This workshop focused on how NRGi can help SAIs use such payment in their oversight function. Since then, WGEI has been exploring with NRGi other opportunities to support SAIs.¹⁶⁰ NRGi Ghana plans further training activities with the Audit Service in 2020 on different resource governance data tools, including resourcecontracts.org.

¹⁶⁰ Mostly untriangulated data from NRGi staff member who was involved, but www.resourcebenefits.ng/reports/ is evidence of PLSI's platform and recent use of payment to government data to produce reports

NRGI has contributed to other data use cases that have led to changes in policy and practice. One example from the DRC contributes to a growing body of evidence that collective action around citizen-generated data is a particularly effective means to challenge power and trigger responses that impact people's lives.¹⁶¹ Other cases represent more traditional, technical approaches to using data to influence policy:

- *Generating monitoring data for citizen oversight:* In the DRC, citizens supported by a local CSO generated data that demonstrated communities were not getting a fair deal from a mining operation. After the data was used as part of advocacy efforts, the company responded by investing in infrastructure that increased local access to services.
- *Use of data for policy monitoring:* NNGI staff, often in partnership with other CSOs or government staff, have produced fiscal analysis and recommendations using data from various sources that enabled respective governments to:
 - **adopt a tax policy** in DRC that, while still problematic and posing issues that should be addressed, strikes a better balance between country and investor needs than the original proposal
 - **negotiate a fairer deal** with companies in Guinea
 - **improve the oil revenue management law** in Guyana
 - **take steps to tighten the revenue management of SOEs** in Myanmar
- *Using data on transparency benchmarks to trigger more transparent practice.* There are some other examples, for example in Tunisia, of the RGI being used to prompt further disclosure by government.

The evaluation raises questions on whether the emphasis placed on data use as a special sort of evidence that followed NNGI's successful efforts to influence disclosure is still relevant. The evaluation focus on data illustrates the emphasis that NNGI has given to open data in recent years. It is easy to understand why NNGI tracks usage of mandatory disclosure data—it is important to demonstrate proof of concept—that disclosures NNGI advocated for make a difference. Relatedly, it is important to track the use of the various platforms that NNGI curates because they represent a huge investment in increasing data uptake. However, it is not entirely obvious why the use of some other kinds of data merits more attention than the use of evidence more broadly. Constructing programs around data use as opposed to integrating the use of data within an overall approach to evidenced-based advocacy and policy analysis may result in staff and partners considering it to be different or more difficult to use than other forms of evidence.

NRGI is expected to continue to play an important role in efforts to increase access to and use of data within the sector, both through capacity building and intermediation.¹⁶²

Evidence that the accurate use of open data will trigger changes in accountable natural resource governance through policy implementation, civil society advocacy or citizen-led mass mobilization is still sparse. Moreover, evaluation findings highlight various challenges associated with advancing data use and the complicated intermediation and audience targeting required. Nonetheless, a couple of external informants from global NGOs assume NNGI is going to play a critical role in supporting and enabling learning in this area going forward.

¹⁶¹ NNGI outcomes database

¹⁶² Interviews Global NGO partner, EITI Secretariat, evidence from the PWYP DE evaluation

4.4 LEVERAGING INFLUENCERS

Assumptions

Staff who understand the potential benefits of influencing will be willing and able to proactively pursue partnerships with important international influencers.¹⁶³ Influencing will be based on an analysis of entry points at global, regional and national levels, effective coordination internally as well as with partners who can play complementary roles. Engagement with influencers will strengthen and amplify NRGi's voice if influencers are predisposed to receive NRGi's messages. The NRGi approach to engagement as well as its reputation for rigorous, independent evidence will drive success.

Methodological note: the evaluation only looked at this question superficially, partly because of confusion among staff in NRGi around the meaning of the influencing theme.

Headline finding

Individual staff are taking proactive approaches to influencing work and there are examples where audiences are predisposed to accept NRGi's messages because of its evidence-based approach. NRGi appears to have had some success in collaborating with partners to influence important global institutions. However, this is poorly evidenced, due to limited/fragmented data, and resulting inability to triangulate information.

Staff are not entirely satisfied with this aspect of NRGi's work. This is because there is no coherent and commonly understood definition of influencing or a clear influencing strategy for particular actors that is shared and coordinated across the organization, which means this work tends to be more individualistic and ad hoc than it ideally should be.

Evidence

NRGi staff are engaging with influencers; the majority of staff believe that they are taking a proactive approach to working with the most relevant institutions. Considerable numbers of NRGi staff report they are working with bilateral and philanthropic donors, global initiatives such as the EITI, large INGOs, International Financial Institutions (IFIs) and Development Finance Institutions (DFIs).¹⁶⁴ Aggregated survey data is hard to interpret: due to the global coverage of NRGi's work, many of the organizations that respondents listed were only included once or twice. Nonetheless, 34/42 (over 80 percent) of staff respondents who answered the question believe they are working with the most relevant influencers where they are located. EITI, DFID, Oxfam, the World Bank Group, the IMF and the African Development Bank (AfDB) are the most frequently mentioned,¹⁶⁵ with six or more mentions each. Several respondents noted that they did not work with the IMF, WB and AfDB either because they have no operational base in the countries where they work; or because NRGi staff have not identified a thematic link; or because they do not know people in the organization.¹⁶⁶

Strategic influencers appear predisposed to receive and adopt NRGi's evidence-based messaging and this creates a potential multiplier effect. Given the strong endorsement of NRGi's research and evidence mentioned earlier, it is unsurprising that 5/7 (71 percent) of global influencer survey respondents claimed NRGi has influenced their organizations.¹⁶⁷

¹⁶³ for the purpose of this evaluation, influencers were defined in the evaluation survey sent to staff as organizations that are able to influence extractive debates, policy and norms globally or in one or multiple countries/regions. Typically, they would include international financial institutions (IFIs), regional development banks, donors, multilateral initiatives (e.g., EITI), multi-donor initiatives, large international NGOs etc.

¹⁶⁴ Analysis of survey responses to question 4.1: "Assuming the following working definition* of external influencer, please identify by name influencers that operate in your country, region or theme of work that you currently work with and briefly explain how you work with them."

¹⁶⁵ Analysis of survey responses to question 4.3

¹⁶⁶ Analysis of survey responses to question 4.2

¹⁶⁷ Analysis of survey responses to question 4.9

NRGI's influence on EITI's global policy and practice is well known and appreciated.¹⁶⁸ It has contributed to the inclusion of norms relating to beneficial ownership and protecting spaces for citizen participation, which can help advance vertically-integrated approaches. A significant recent win, accomplished together with PWYP, Oxfam, Global Witness and others, was the EITI Secretariat's decision to include contract and project payment transparency, environmental reporting and gender in its framework.¹⁶⁹ The EITI evidently proves an effective vehicle for NNGI to exert influence and achieve wider impact.

NRGI has also undertaken long-term influencing work with the OECD and IMF. Staff believe this contributed to the IMF's recent decision to include commodity trading and contract disclosure within its Fiscal Transparency Code.¹⁷⁰ NRGI is continuing to engage with the IMF to influence its anti-corruption work. NRGI's work on commodity trading transparency is also associated with new global transparency disclosure standards in DFID's "Open aid, open societies: a vision for a transparent world" Transparency Agenda in March 2018.¹⁷¹

There is some evidence that NRGI has influenced donors at the country or regional level.

NRGI played quite a significant role in the design of DFID programs in Ghana prior to its last strategy.¹⁷² In addition, staff were able to influence the IMF's thinking around SOEs during Article IV meetings in Myanmar.¹⁷³ The Latin America team has engaged ECLAC, an arm of the United Nations and the Ford Foundation, and are confident this has influenced ECLAC's approach to resource governance and lowering carbon emissions,¹⁷⁴ and that an NRGI research report commissioned by the Ford Foundation was used to influence its new civil society strategy in the Andean Region.¹⁷⁵

Achieving influence with global institutions requires building long-term partnerships.

The President of NRGI is one of several principal drivers of NRGI's global influencing work. He has leveraged NRGI's reputation for quality research, as well as relationships developed in his former roles with the World Bank and Brookings Institute to engage and contribute to the policies of the international institutions mentioned above.¹⁷⁶ While this has been effective to a degree, if this work is not coordinated with the efforts of other staff, there is a risk that these relationships will be unsustainable.

The nature of NRGI's contribution is not well evidenced or understood. This evaluation generated some data to support the above claims. However, given the significance and the involvement of other partners, the evidence is not good enough.

The RGI could be a useful lever for influence. General enthusiasm for the RGI suggests it could help staff to engage with influencers in different locations and advocate for the inclusion of select RGI indicators in donor policy frameworks. However, uncertainty about future funding and the current lack of time series data threatens its sustainability.¹⁷⁷

168 Global CSO partner interview, EITI Secretariat interview, NRGI staff FGD

169 Daniel Kaufmann, Erica Westenberg, Rebecca Iwerks, Joseph Williams, Rob Pitman. *Contract, Environment, Gender, Project and Commodity Sales Data Among New Disclosure Requirements of Strengthened EITI*, (Natural Resources Governance Institute, 2019). resourcegovernance.org/blog/major-new-EITI-disclosure-requirements

170 Nicola Woodroffe. *New IMF Fiscal Transparency Code Spotlights Major Extractive Sector Corruption Risks*, (Natural Resource Governance Institute, 2019). resourcegovernance.org/blog/new-imf-fiscal-transparency-code-spotlights-major-extractive-sector-corruption-risks

171 DFID, *2018 Annual Review Releasing the Transformational Potential of Extractives for Economic Development (RTPEED)*.

172 NRGI staff interviews

173 NRGI staff interviews

174 Evidence of Carlos presenting at an ECLAC convened conference: resourcegovernance.org/events/mineria-para-un-futuro-bajo-en-carbono-opportunidades-y-desafios-para-el-desarrollo-sostenible

175 NRGI staff interviews

176 NRGI staff and Global CSO partner interviews

177 NRGI staff interview

Despite some evidence of success, staff satisfaction with NRGI's influencing work is mixed. On the one hand, the majority of staff claim to engage with relevant influencers and think NRGI's influencing work is effective. On the other hand, staff operating globally and at the regional and country level express mixed levels of satisfaction and on balance, lower than for other survey questions (see figure 7).¹⁷⁸ Their relative dissatisfaction stems from perceptions regarding the lack of a strategic approach, NRGI failing to approach unusual suspects and poor internal communications and knowledge management, including suboptimal sharing of contacts and discussion records, which prevent staff from maximizing opportunities for engagement with influencers at multiple levels (by different teams, at global and country level).¹⁷⁹

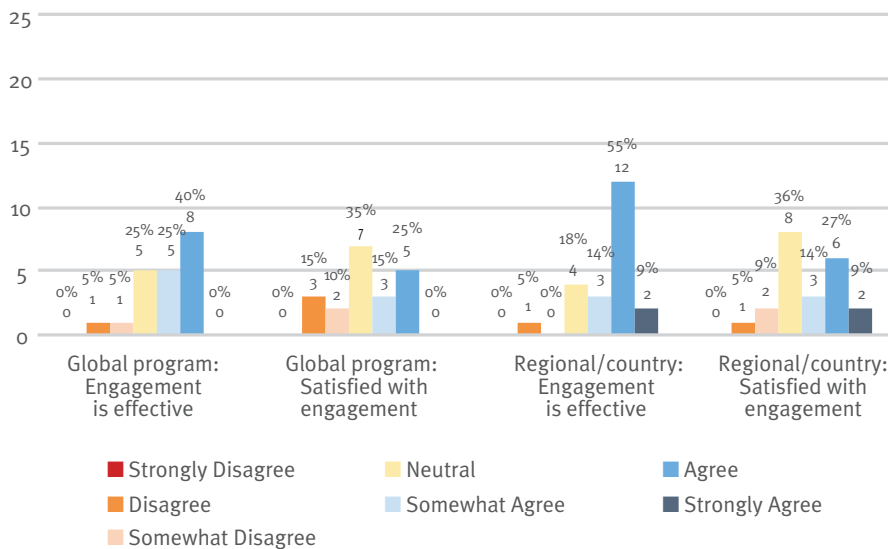


Figure 7. Effectiveness and satisfaction in engagement with influencers (breakdown by NRGi global and regional/country staff)

Mixed levels of satisfaction reflect the lack of an organizational wide strategy or common vision NRGI's influencing work. Discussions around the evaluation methodology and several survey responses demonstrate that NRGI lacks a coherent and commonly understood influencing definition or policy.¹⁸⁰ When asked about potential benefits of influencing, under a third of staff survey respondents identified some common themes. Two were shaping discourse and influencing policy to advance NRGI's agenda or extending NRGI's influence beyond focus countries.¹⁸¹ These are of course highly relevant, but the array of answers did not convey a unified vision of NRGI's approach to influencing international institutions at global and national levels to achieve a multiplier effect. This is partly because NRGI has not identified the aims and scope of this multiplier effect work as distinct from the day-to-day influencing and policy work at a country level. If NRGI were to prioritize different influencers, develop clear objectives and coordinate the approach, NRGI would be able to seize strategic opportunities for collaboration.

178 Staff were asked: "To what extent do you agree with the following statements: I engage effectively with external influencers in my country, region or theme of work; I am overall satisfied with how I engage with external influencers in my country, region or theme of work."

179 Analysis of responses to survey question 4.8

180 NRGI staff

181 Analysis of responses to survey question 4.6

5. Conclusions and recommendations

Evaluation findings reveal that NRGi's theory of change works in pro reform contexts.

- *International norms and standards successfully influenced and promoted by NRGi, such as the Extractive Industry Transparency Index (EITI) and the Resource Governance Index (RGI), 'work' in shaping national governments' incentives to engage with NRGi programs.*
- *NRGi's capacity building works to enable national governments to design and implement improved resource governance policy that has led to increased disclosure and revenue collection in several countries.*
- *NRGi's capacity building works and enables accountability-seeking institutions to engage with and/or improve demands for changes in their governments' transparency and accountability behaviors.*

This is largely because NRGi has been successful in

- delivering on the think and do in contextually relevant ways that leverage cross-comparative rigorous knowledge
- **increasing its focus on policy implementation for long-term change in program design and delivery**
- building capacity (financial and technical) of accountability actors to contribute to policy reform and hold governments and companies accountable
- **being an effective data intermediary that has been able to enhance government and accountability actors' access to and use of extractive data, increasingly through country-led and problem-driven approaches**
- creating a multiplier effect leveraging access to global influencers
- adapting approaches to use of data for more effective uptake and policy reform influence

Despite NRGi's achievements, the evaluation revealed several weaknesses and challenges. Recommendations for improvement include:

- Think and work more politically, making explicit understandings of power and context that inform program design and adaptation
- Disaggregate and clarify NRGi's theories of change and action, including the role and relationship to citizens, and the linkage between global and national impacts
- Clarify NRGi's engagement with local partners that prioritizes building their capacity and influence, including availability of funding, technical and political support, and complementarity in roles
- **Develop country specific data use and capacity development plans**
- Create an influencing strategy which identifies key actors, objectives and effectively coordinates NRGi's inputs for more concerted partnership

Follow-up work

In view of the evaluation's methodological limitations, I also put forward here several follow up actions for consideration. These aim to strengthen its evidence and understanding of the key findings and if, how and why it contributes to citizens being able to enjoy the benefits of natural resource wealth in the countries where it works. Priorities include:

- **Engaging with like-minded organizations on TPA theories of change and the risks of 'open washing.'** NRGi has already had some preliminary discussions with the International Budget Partnership (IBP) and Oxfam America regarding collaborative learning on these issues. IBP is currently reflecting on the implications for its Open

Budget Initiative program. Hence, it might be useful for NRGi to convene further discussions in the near future.

- Assessing the advantages and disadvantages of NRGi focusing on thinking rather than ‘doing work.’ Many government and civil society actors value NRGi’s integrated thinking and doing approach. This is partly because NRGi’s independence and international position lend it legitimacy. Yet, some evaluation findings suggest that NRGi’s long-term, direct support to governments may lead to dependency and reduce opportunities for local partners to take on NRGi’s role. Thus, NRGi might benefit from undertaking more real time monitoring and learning on the efficacy of deliberate attempts to build partner capacity and to do ‘itself out of a job’ (described below under the next bullet point). Such studies might assess if, how and why capacity development approaches:
 - are effective in enabling partners to achieve a particular level of financial, and technical capacity;
 - work politically in terms of being accepted by personnel in relevant ministries.
- Assessing if and how NRGi contributes to the long-term technical and financial capacities of its partners. NRGi might also use the approach above for systematic, longitudinal and participatory approaches to explore a slightly broader question on how NRGi’s different capacity development approaches, including training and accompaniment at different levels contribute to sustained financial and technical capacity of different actors over time. This would also enable a more rigorous assessment of the extent to which it inadvertently competes with partners for financial or other opportunities to advance transparent and accountable natural resource governance.
- Partnering with other organizations to assess the impact of NRGi’s work on translating effective laws and policies into tangible benefits for citizens. NRGi’s work in certain countries has contributed to increases in revenue collection. Exploring if and how this then contributes to NRGi’s goal– benefits to citizens—would be of interest to the wider field. These case studies could explore the roles that innovative accountability-seeking institutions that NRGi supports play in such processes. The Public Interest and Accountability Committee in Ghana is but one example.
- Continue to monitor the impact of data use and uptake. NRGi has proved it can increase various actors’ interest in and uptake of mandatory disclosure data. Going forward, it should maintain an interest in learning if, how and why different uses contribute to capacity and leverage incentives that encourage governments to adopt more accountable revenue collection and management practices.
- Plan for deep dive assessments as part of an evaluation at the end of the next strategy period. This would involve maintaining current monitoring data on outcomes and using them plus any other data from impact stories or the studies suggested above to inform the design and sampling strategy of a theory-based strategy evaluation.

The following table presents a summary of findings, areas for improvement and recommendations relating to the four key evaluation themes.

Achievements	Areas for improvement	Recommendations
Question one: Think and do		
<ul style="list-style-type: none"> NRGI is recognized by national and global partners as a thought leader in the extractives field. Its evidence is rated as being of better quality than its peers. 	<ul style="list-style-type: none"> Occasionally NNGI's emphasis on thinking rigorously can reduce the utility (doing potential) of its products. NRGI does too much. It sometimes tries to lead thinking in areas where it lacks a comparative advantage. In addition, NNGI's transparency work is insufficiently integrated with accountability policies across the decision chain. Staff and partners would like NNGI to make its position and role in helping governments respond to international climate change policy and the growing importance of renewables explicit. 	<ul style="list-style-type: none"> Use recent lessons from the field, e.g., the World Bank's synthesis of evidence on influencing to select appropriate levels of rigor for NNGI's different influencing aims and audiences.¹⁸² Decide on which areas NNGI should lead and where it should follow others. Continue to emphasize and evolve NNGI's understanding of how to partner effectively, working beyond transparency to focus on accountability and effectiveness, including continuing to push for tangible revenue gains.
<ul style="list-style-type: none"> NRGI's ability to combine locally relevant research with international experience using rigorous evidence and practical tools motivates partners to engage with its services and products at national and global levels Staff and partners consider the Resource Governance Index (RGI) to be a particularly useful tool for leveraging NNGI's thinking and doing function. 	<ul style="list-style-type: none"> NRGI's global convening function is missing opportunities to increase the organization's influence. 	<ul style="list-style-type: none"> Aim to improve NNGI's global convening function to enhance NNGI's visibility and influence.
<ul style="list-style-type: none"> Over the past three years NNGI's small Monitoring, Evaluation and Learning (MEL) team has established the foundations of a strong MEL system. They are enabling NNGI to increase its engagement in collaborative learning initiatives around NNGI's theory of change that involve leaders in the TPA and governance learning field. 	<ul style="list-style-type: none"> NRGI has not contributed as much as it might have to collaborative learning in the field. This is because its evaluations are not on a par with its own thematic work or other organizations' evaluations. Another possible reason is that its conceptual frames, which focus on changing legal and formal rules, differ from those used by others who tend to focus more on citizen mobilization/collective action and shifting norms/informal institutions as key tactics. 	<ul style="list-style-type: none"> Strengthen organizational capacity to play a more proactive part in learning within the field. For example, build capacity to commission quality evaluations that explore the contribution of NNGI versus other actors more rigorously. Share NNGI's emerging conceptual thinking on implementation gaps as well as insights from this evaluation as they may be of interest to peers who are at more nascent stages in their thinking on such issues.
Question two: Lasting outcomes		
<ul style="list-style-type: none"> During the past three years NNGI's staff have increased emphasis on long-term change. 	<ul style="list-style-type: none"> NRGI's short-term planning cycles are perceived as undermining its potential to support lasting outcomes. 	<ul style="list-style-type: none"> Seek and advocate for longer-term flexible funding and to enable more flexible planning cycles where possible.
<ul style="list-style-type: none"> NRGI has contributed to closing implementation gaps and making the influence of its work more sustainable in several reform-friendly contexts. Implementation often involves transparency and the disclosure of information, but important examples of increased government revenue collection are emerging Staff have succeeded in influencing policy implementation because they have been able to take advantage of external incentives driven by donors and global norms. They have combined technical, relational and data intermediation skills to achieve implementation. NRGI staff have adapted/reframed objectives, making them of continued relevance following political transitions that shift government incentives. 	<ul style="list-style-type: none"> NRGI staff are not paying sufficient attention to negative outcomes that are being discussed by others in the field, particularly the risks of externally-driven incentives leading to open washing or isomorphic mimicry by governments. 	<ul style="list-style-type: none"> Encourage discussions on the risks of externally driven norms or standards incentivizing open washing and the implications for NNGI's work in different contexts – disclosure without real openness or accountability. This would involve, among other things, NNGI being more explicit regarding its assumptions on how its specific work to help citizens benefiting from natural resources takes into consideration the work needed to shift deep power structures and how such shifts are achieved. This might occur through learning with other organizations, or internal discussions on theory of change and action.

Achievements	Areas for improvement	Recommendations
<ul style="list-style-type: none"> On occasion, policy implementation has resulted from governments responding to the demands of domestic accountability-seeking actors, some with capacities strengthened by NRGi. 	<ul style="list-style-type: none"> NRGI's programming on the implementation gap and strengthening accountability-seeking institutions does not appear as integrated as it might be. 	<ul style="list-style-type: none"> Aim to make conceptual frameworks as well as programming on the implementation gap and sustainable movements/coalitions more integrated with the program design around technical policy work in the future. This would involve country plans and monitoring frameworks being explicit about how partnerships and work with accountability seeking actors drive incentives for governments to implement the policies it seeks to influence through its advocacy and capacity development work.
<ul style="list-style-type: none"> NRGI has made valued contributions to the financial and technical capacity of various CSO coalitions and other accountability-seeking actors, including journalists who are at varying states of maturity. 	<ul style="list-style-type: none"> NRGI's approach to partnership is valued, but it is too ambiguous regarding its grant-making function and its role in relationship to PWYP in countries where both organizations operate. Additionally, the criteria NRGi uses to assess partners' readiness to take on NRGi's role are vague. This is important. It is difficult for partners to assess their capacities and sustainability in contexts where funding opportunities and the technical capacities they need are constantly shifting in line with global donor trends. 	<ul style="list-style-type: none"> Communicate plans that result from more politically informed country-level planning (below) to key partners. In countries where it is relevant, explain the rationale for NRGi's decision on if or how it has decided to collaborate with key partners and organizations. Promote the use of participatory capacity assessment tools to ensure NRGi and its partners share an understanding of what capacities partners need to demonstrate in order for both parties to conclude NRGi has 'done itself out of a job.'
<ul style="list-style-type: none"> Question three: Data use 		
<ul style="list-style-type: none"> NRGI has learned that solution or data-led capacity development (CD) approaches are ineffective. Recent experiments have worked better. This is because NRGi has taken a participatory, country-led approach to learning about the problems, data needs and aptitudes of individual data users and then customized CD approaches to address them. 		<ul style="list-style-type: none"> Build on lessons from recent successes and scale up country-led participatory approaches to increasing the use of data, including by making data user and use assessments central to country context analysis and the development of country-level theories of action. This might involve mapping the data landscape, data users and uses during context analysis and then integrating data capacity development and use approach within the policy implementation strategy.
<ul style="list-style-type: none"> A new capacity development framework that was shared at the Asia Development capacity development workshop in December 2018 builds on NRGi's lessons and segments potential users looks like a promising tool to replicate recent success. 		<ul style="list-style-type: none"> Explore whether the Open Oil use case types discussed in the PWYP Data Extractors program evaluation could be a useful way to bound different data CD offers.¹⁸³
<ul style="list-style-type: none"> NRGI is playing a useful intermediary role in increasing the availability and use of data on extractive industries. Global partners expect it to continue to play an important intermediation role in the future. 	<ul style="list-style-type: none"> As of yet, there is little evidence that the use of data made available and accessible as a result of a) NRGi supported advocacy and b) its resource data platforms, leads to changes in government behavior and development outcomes. Though NRGi has to track data use for different purposes, there is a risk that this makes data a special category, setting it apart from NRGi's wider focus on evidence. 	<ul style="list-style-type: none"> Continue to monitor and deepen understanding on the outcomes of data use enabled by NRGi platforms. Seek to undertake a significant cost benefit analysis of NRGi's support for data work, particularly mandatory disclosure data at the end of the next strategy. When considering these recommendations, explore the pros and cons of defining data as a special object of interest that is distinct from other types of evidence.

Achievements	Areas for improvement	Recommendations
Question four: Leveraging international influencers to achieve a multiplier effect		
<ul style="list-style-type: none"> The strategic work of individual NRG staff has influenced some international institutions and had a multiplier effect, particularly through global norms and standards such as the EITI and the IMF's Fiscal Transparency Code. 	<ul style="list-style-type: none"> The potential of these efforts is undermined because staff do not share a common understanding of the aims of this work and NRG lacks a coordinated plan to guide them. 	<ul style="list-style-type: none"> Assign responsibility for developing, communicating and monitoring an influencing strategy/plan that clearly defines this area of work and explains the specific roles and responsibilities of different actors operating at different levels in implementing it.
<ul style="list-style-type: none"> The popularity of the RGI suggests it could be used to leverage influence through the inclusion of some of its indicators in donor policy or performance assessment tools. 		<ul style="list-style-type: none"> When developing the plan consider the pros and cons associated with using the RGI as an influencing tool to strengthen brand and leverage NRG's influence. These might include the risks of the RGI encouraging open washing.

182 David Evans and Markus Goldstein. *8 Lessons on How to Influence Policy-Evidence from Oxfam's Experience*. (World Bank, 2018). blogs.worldbank.org/impacitevaluations/8-lessons-how-influence-policy-evidence-oxfam-s-experience

183 Cathy Shutt. *PWYP Data Extractors Evaluation Report* (Publish What You Pay, 2019), 37.

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Resource contracts: www.resourcecontracts.org

Resource projects www.resourceprojects.org

Resource data www.resourceprojects.org

Annex 2

Lasting outcomes case notes

GUINEA

Result: In Guinea, a seven-year relationship has enabled NRGi to make an important contribution to the adoption and implementation of a number of policies. These not only represent sustainable changes in the government's norms and practices, according to the Minister of Mines, they have also encouraged investor confidence.¹⁸⁴

- A Ministry of Mines website that includes detailed information and mining resource contracts was implemented and then updated in 2018. (NRGI provided technical assistance)
- The development and implementation of a mining code both attractive to investors and with strong tax provisions, as well as transparency and enforcement measures. Mining investment has picked up since 2016 and tax collection increased from 2.2 to 2.9% of gross national product between 2016 and 2017 according to the country's latest EITI report.¹⁸⁵ (NRGI provided technical advice.)
- The state-owned enterprise SOGUIPAMI implemented recommendations to increase transparency after achieving a low score on the RGI. (NRGI provided technical advice.)
- Financial modelling that is reported to have become part of everyday practice and enabled the Ministry of Mines to routinely discuss investors' assumptions in feasibility studies and push back on unreasonable demands for tax incentives.

Process: The initial entry point for NRGi's was high level political meetings in which NRGi was presented as a possible support to proposed reforms in the sector. Staff and a former advisor to the Ministry suggest these contributions were enabled by the political and economic context, as well as NRGi's (which was then RWI) strategic approach that included having an advisor embedded in the Ministry of Mines. In 2011 the election of Guinea's first democratic government led to a reopening of relationships with donors, such as the World Bank and IMF. The political incentives created by the government's program to access IMF credit lines created an opening for the RWI Transparency and Accountability project to assist reform-minded technocrats working in the Ministry.¹⁸⁶ IMF conditions added external incentives to accelerate governance reforms in the mining sector.

In a short period of time, NRGi established itself as a trusted source of independent expertise on both the economics and the governance of the mining sector. The approach was opportunistic and informal. An interview with a Guinean advisor involved in the Ministry at the time corroborates that this relatively informal approach won trust. NRGi was able to influence norms and practices within the Ministry, as well as priorities from donors and other international actors.¹⁸⁷ Among others, NRGi had an important impact on the content of the mining code published in 2013, on the design and implementation of a vast mining contract review process, on the systematic disclosure of regulatory information, on the mining ministry's medium term planning and the sector strategy. NRGi also influenced the content of IFIs and donor programming in the mining sector..

¹⁸⁴ NRGi outcome data base (claims regarding initial support to Mining Code triangulated through interview with former government advisor, more recent mentions triangulated by the Minister of Mines' acknowledgement of NRGi's technical support in Hervé Lado. *Guinea's Mining Minister: How Guinea Met the Contract Transparency Challenge* (Natural Resources Governance Institute, 2019).

¹⁸⁵ Cowater-Sogema, Independent Validator, *Guinea's EITI Validation Report – zero draft* (2018). eiti.org/sites/default/files/documents/validation_report_country_guinea_zero_draft.pdf

¹⁸⁶ NRGi staff interview

¹⁸⁷ Government partner interview

Eventually, NRGIs' embedded technical assistance came to an end, aligning Guinea with the structure of other NRGIs' country programs. But NRGIs maintained strong relationships and provided advice to Ministry staff and the SOE SOGUIPAMI. Further engagement with government stakeholders included advocacy for enforcement of the mining code, implementation of the 2017 RGI recommendations, continuous capacity building on contracts disclosure and on fiscal modelling of projects, sector data disclosure, EITI implementation, community relations and local content policy as well as consultations on the uptake of the Guinea RGI 2019 interim recommendations.

These ongoing engagements over the period of the current strategy have contributed to the Ministry being able to upgrade its disclosure website. With additional support from GIZ, NRGIs has also helped the Ministry develop financial modelling skills that should increase revenue collection during the strategy period.¹⁸⁸

The long-term relationship between NRGIs and the Ministry has also enabled NRGIs to influence how the Ministry engages with civil society.¹⁸⁹ Even though civil society had established its own relationship with the Ministry, a representative of Action Mines, one of NRGIs' partners reported that NRGIs' facilitation made the Ministry far more responsive.¹⁹⁰ Unfortunately, I was not able to check if civil society actors played any part in exerting pressure on the ministry in respect of some of the reforms that have been implemented. But a brief account of NRGIs' support for civil society can be found below.

Support to civil society coalitions: In addition to direct support to the government during the strategy period, NRGIs has also made technical and financial contributions that have led to improvements in Guinean civil society's understanding of the extractives sector. They have also increased CSOs' confidence in engaging the government and leveraging the EITI. Building this capacity has been no easy task, and the story of how NRGIs has responded to various challenges illustrates the efficacy of its long-term vision and persistent approach.¹⁹¹

NRGIs eventually decided to seek new partnerships, including with a group of young journalists. They were subsequently invited to participate in one of NRGIs' summer schools. The young journalists went and valued the international sharing experience.¹⁹² Attending with government counterparts helped build relationships that made their work more effective back home. It also led to the establishment of a new organization, Action Mines.¹⁹³ According to an Action Mines representative, as well as increasing their confidence to engage government, support from NRGIs has also enabled them to pass on knowledge gained in their in their journalistic work with communities. As a result, communities are more aware of what they are entitled to and prepared to monitor mining contract obligations. If this can be triangulated, it is a remarkable change in a country where discussions about natural resources were taboo as recently as 2007.¹⁹⁴

While the Action Mines representative acknowledged their capacity had grown, he said it was nascent and that they still need technical and financial support from NRGIs. Moreover, as mentioned above, NRGIs' international identity enables them to gain quicker access to the government. This perhaps highlights unequal power relations and the risks of NRGIs' multi stakeholder group approach leading CSOs to depend on NRGIs brokering relationships with governments in some contexts.

188 Lado, *Guinea's Mining Minister: How Guinea Met the Contract Transparency Challenge*.
resourcegovernance.org/blog/guineas-mining-minister-how-guinea-met-contract-transparency-challenge

189 NRGIs staff interview

190 CSO partner interview

191 Guinea case study from NRGIs Civil Society Assessment, 16.

192 CSO partner interview

193 NRGIs staff interview

194 NRGIs staff, CSO partner interviews

TUNISIA

Result: NRGi contributed to the ability to the government and one of its state-owned enterprises to implement commitments to disclose EITI data.¹⁹⁵ The state-owned mining company is now disclosing information related to phosphate revenues on its website. NRGi also played a part in The Ministry of Energy and Mines releasing over 40 mining and 50 oil contracts plus comprehensive disaggregated data on royalties, taxes, and ETAP—another state-owned enterprise’s—oil profits.¹⁹⁶

Process: NRGi began working on a multi-stakeholder approach to long-term reforms in natural resource governance in Tunisia in 2013. Its challenge was to bring different actors together to agree to democratic reforms in a context where citizens placed little trust in the volatile, post-authoritarian institutions and frequently protested about the negative impacts of the extractives sector.¹⁹⁷ Since then, NRGi has provided extensive technical and financial support to enable Tunisian civil society actors to develop advocacy, analysis and organizational management skills. At the same time, NRGi supported the establishment of the Tunisian Coalition for Transparency in Energy and Mines (CTTEM), a 13-member coalition that translates local grassroots demands into national-level advocacy campaigns.¹⁹⁸

NRGi’s convening power and technical support enabled CTTEM to leverage the EITI and OGP in response to the government’s desire to impress donors.¹⁹⁹ This was helped by legal provisions in the 2014 Constitution,²⁰⁰ as well as insider relationships a key NRGi staff member had developed when in government.²⁰¹

The government’s commitment to join the EITI in 2016 provided the civil society coalition with additional leverage, which was amplified by Tunisia’s relatively poor performance on the RGI in 2017. This poor performance meant CSOs could use the RGI as an advocacy tool to measure implementation gaps. At the same time, it incentivized the SOE enterprise that performed poorly on transparency to open up and seek to improve. For the first time ever, NRGi succeeded in organizing a workshop targeting SOEs, which attracted senior-level staff (general directors and directors). They were interested in the RGI and learning about their ranking, as well as their strengths and weaknesses. Afterwards, participants acknowledged the RGI’s results as scientific and objective and went ahead with publishing phosphate revenue data on a government open data portal.²⁰²

A particularly interesting facet of this case is that the CSO PWYP movement was triggered by youth protests arising in response to unemployment and the environmental impacts of resource extraction companies before the start of the Arab Spring.²⁰³ However, as they used adversarial tactics they were not taken seriously. NRGi used its international expertise and convening power to help them develop the technical knowhow they needed to play an insider role and be taken seriously. It also brokered relationships so they could use more collaborative tactics as part of multi-stakeholder engagement with the government.

Those interviewed for a rigorous case study of these events reported that NRGi’s approach worked because rather than interfering and imposing ideas on the government, NRGi focused on training local think tanks and journalists in the skills required for research and advocacy.²⁰⁴

195 Wissem Heni. *Tunisians Can Now Access Hydrocarbon Contracts in Open Data Format* (Natural Resources Governance Institute, 2016). www.opengovpartnership.org/stories/tunisians-can-now-access-hydrocarbon-contracts-open-data-format

196 NRGi outcomes database

197 resourcegovernance.org/analysis-tools/publications/nrgi-impact-civil-society-tunisia

198 resourcegovernance.org/analysis-tools/publications/nrgi-impact-civil-society-tunisia; NRGi staff interview

199 Martin, *Policy Reform for Increased Transparency, Accountability and Good Governance in the Tunisian Extractive Industries*.

200 Martin, *Policy Reform for Increased Transparency, Accountability and Good Governance in the Tunisian Extractive Industries*, 19.

201 NRGi staff interview

202 NRGi outcome database

203 Martin, *Policy Reform for Increased Transparency, Accountability and Good Governance in the Tunisian Extractive Industries*.

204 Martin, *Policy Reform for Increased Transparency, Accountability and Good Governance in the Tunisian Extractive Industries*, 16.

An additional point of interest that it has not been possible to follow up is the efforts of the Instance Nationale de Lutte Contre la Corruption (INLUCC), an independent public authority, to institutionalize the MSG mentioned above. This is described as a sustainability strategy to reduce the possibility of a backslide on standards such as the RGI in the face of political uncertainty.²⁰⁵

Despite NRGi's achievements in using relationships and expertise to convene different actors and enhance their capacity, the case study notes little progress in the government implementing policies that would make a significant difference to resource governance.²⁰⁶ It also hints that there are risks of open washing. While transparency has become a part of government discourse, the author identifies a set of obstacles to accountability. However, according to staff interviewed the time of the evaluation, they were more concerned about the uncertainty of continued funding from NRGi than they were of political risks and instability.²⁰⁷

MEXICO

Results: In Mexico, NRGi contributed to the National Hydrocarbons Commission (CNH), a financially autonomous arm of the Federal Executive, implementing commitments to publish all details of bids for contracts since 2015.²⁰⁸

Process: According to a senior CNH official, NRGi convinced him of the importance of publishing contracts held by state-owned oil company PEMEX. As a result, CNH published online the name of companies involved at each stage of the bidding process, all progress in the bids, contracts with foreign companies, investment plans and other important data that help build public trust and accountability. Importantly, CNH also published PEMEX licenses. NRGi continues to work with CNH to institutionalize these commitments, including by making sure that PEMEX publishes the same project-level information required of private companies.²⁰⁹

However, this policy was influenced by NRGi and CSO coalitions with significant capacity and community level representation, incentives already existed within the agency and this was a relatively easy win. A senior official in CNH, a fledging institution, bought into the transparency agenda and wanted to do well on the international stage. Therefore, he was inclined to respond positively to global norms and standards, such as the EITI. However, in this instance the main institutional incentive driving change was the domestic political situation. Mexico had suffered a low and declining level of public trust in government institutions from 2014 to 2017.²¹⁰ NRGi, an independent international organization with the requisite technical and relational skills, offered CNH a solution.²¹¹ Interviews with NRGi's partner and a survey response from a government representative suggests that NRGi played a valued role, "NRGi has been a key third party in order to build trust and have a successful stakeholder engagement with civil society and to improve transparency in licensing and contract management."²¹²

Later CNH and NRGi converged around the idea of setting up a CSO monitoring group to ensure these commitments were implemented. The group was composed of highly critical CSOs including Fundar to make sure it was perceived as truly independent and not merely a face-saving operation prepared to endorse partial or not very meaningful transparency.

205 Clara Volintiru and Olivas Osuna, José Javier. *Preventing Corruption at Local and Regional Level in South Mediterranean Countries*. (European Committee of the Regions (CoR) 2018). eprints.lse.ac.uk/90170/1/Olivas-Osuna_Preventing%20corruption_2018.pdf

206 Martin, *Policy Reform for Increased Transparency, Accountability and Good Governance in the Tunisian Extractive Industries*, 28.

207 NRGi staff FGD

208 NRGi staff, CSO partner, Government advisor interviews

209 NRGi outcome database

210 Pizzolitto, Georgina, Elizabeth J. Zechmeister, Vidal Romero, and Pablo Paras. *THE POLITICAL CULTURE OF DEMOCRACY IN MEXICO AND IN THE AMERICAS, 2016/17*, (United States Agency for International Development, 2018) 16. www.vanderbilt.edu/lapop/mexico/AB2016-17_Mexico_Executive_Summary_V3_05.21.18_W_062518.pdf

211 Former Government advisor, CSO partner, NRGi staff interviews

212 Government respondent survey response

The National CSO coalition involved in the monitoring appreciated NRGI, a long-term partner, opening doors with CNH and enabling them to engage in MSG discussions that involved community level representation in advocating for and monitoring policy implementation by CNH. However, a representative of Fundar also described their relationship with NRGI having become more ‘complicated’ as a result of NRGI becoming more directly involved in providing CNH technical expertise to move forward on these transparency commitments.²¹³

NRGI provided Fundar, a major CSO partner with core funding of \$65,000 per annum from 2014 to 2017, \$45,000 in 2018; the amount to be granted in 2019 is expected to decline further.²¹⁴ This reduction occurred when NRGI had to rely on core funds to support its work in Mexico and thus began playing a more direct, insider role, and providing direct services to CNH.²¹⁵

As Fundar has multiple donors, this was unlikely to affect its sustainability. According to one staff respondent, however, this shift in financing could lead to Fundar rejecting future funding. This is not just about the money, this shift in financing and roles reflects a change in NRGI’s theory of change and partnership model. In Mexico, NRGI has shifted from a solidarity-based partnership approach that supported CSO partners and citizens in creating a narrative in the civic space around extractives and challenging power relations to an approach that focuses on formal policy and systems. The primary drivers of this new model were likely NRGI’s desire to increase impact alongside a decrease in the organization’s core funding.²¹⁶

When it comes to sustainability, the Mexican case also provides interesting insights on if and how reform incentives change and challenge the sustainability of policy implementation following the election of a more nationalist administration.

This points to the importance of reframing arguments for transparency following elections to appeal to new interests and sustain implementation. However, there is also a more operative issue emerging– finding champions within new administrations willing to continue the work.²¹⁷

GHANA

Results: NRGI has provided inputs to Ghana’s process of legal reform in the petroleum sector over a period of several years.²¹⁸ A key feature of this legal reform process is the transition from an “open door” (direct negotiation) license allocation process to a competitive bidding process that is now being implemented.

Process: This has been a long process. Early draft reform proposals still enabled Ministers to opt for direct negotiations. In 2015, NRGI responded suggesting Ministers should be answerable and publish reasons for disregarding bids together with advice on how other aspects of bids could be made more transparent.

The final 2016 Petroleum Exploration & Production (E&P) Act included some of these suggestions. However, it was not clear on whether full text-contracts and their amendments would be included in the register, or merely a list of license holders. Thus, together with its partner, the Africa Centre for Energy Policy (ACEP), NRGI helped to build momentum around stronger transparency provisions in the legal framework through a public workshop on the E&P Act. This was part of its 2016 Anglophone Africa Regional Extractive Industries Knowledge Hub summer school. Leveraging its convening and relational power, the chairperson of the drafting committee for the Act was invited to the school and NRGI made explicit recommendations for elaboration in regulations of the transparency issues it had raised during consultation on the E&P Act.

213 CSO partner Interview

214 NRGI Grant report 2014-2017, NRGI staff interview

215 NRGI staff FGD

216 NRGI staff comments on draft

217 NRGI staff comment on draft report

218 Unless indicated otherwise much of this story is built on data from NRGI’s outcome database.

In 2017, NRGi's efforts to improve the act and push for its implementation continued under a new administration that was also committed to public spending and dealing with corruption in order to access credit from the IMF.²¹⁹ This provided external incentives for government transparency that NRGi could leverage. While waiting for the government to settle into office and provide a clear agenda for work on extractives, NRGi continued collaborations on improving the Act and other resource governance issues in partnership with ACEP, GHEITI, PIAC and the Ghana Oil and Gas for Inclusive Growth Program (GOGIG) funded by DFID.

In late 2017, NRGi was able to leverage its relationship with the new Deputy Minister for Energy (Petroleum), Dr. Mohammed Adam Amin, a transparency champion and former director of one of NRGi's CSO partners, ACEP, in order to develop deeper relationships with the Ministry of Energy. This soon resulted in NRGi being asked to review and comment on new draft petroleum regulations. NRGi presented its recommendations to the Ministry's legal department in October 2017. According to the senior staff of the department, even though the Department did not agree with all of the comments, many were taken on board and the overall submission was viewed as extremely helpful and responsive to the Ministry's needs.²²⁰

This official also spoke highly of the workshop NRGi arranged in July 2018 in collaboration with Open Contracting Partnership (OCP) where Mexico and Lebanon's petroleum regulators shared lessons from their experience in executing their first bid rounds (mentioned earlier).

As might be expected, when the Petroleum Regulations were issued in August 2018, they contained a number of transparency provisions that NRGi had been advocating for in various fora since 2015, which the Ministry began implementing soon after. The official interviewed remarked that the current administration takes implementation very seriously because they know they are being scrutinized by PIAC and ACEP. In other words, partners and institutions whose capacities have been strengthened in part by their relationships with NRGi are creating national level political incentives to close the implementation gap.

This example offers interesting lessons on the potential of different tactics and the role of media and other accountability actors in sustaining implementation. One informant said that the Public Interest and Accountability Committee (PIAC), nurtured by NRGi with funding from DFID, does not enjoy the kind inclusive grassroots representation that would enable it to play a part in a vertically integrated model involving the monitoring of specific contracts oil.²²¹

Notwithstanding, both PIAC and ACEP are able to encourage public oversight at other levels, by using local radio to stimulate debate about the government's lack of transparency. In 2018, PIAC's public exposure of leakage in the petroleum industry stirred public debate on fiscal rules.²²² Though the Ministry official interviewed speculated that this was unlikely to deal with root causes and prevent vested interests benefitting from corrupt practice, such public scrutiny does mean they can't be as brazen. Moreover, new methods of oversight that stimulate public debate are feeding into the political calculations elites who oppose more accountable governance of Ghana's resources.

Work with accountability actors: Mention of PIAC's involvement in the above story of change deserves further unpacking since PIAC was one of the main focuses of NRGi's work with accountability actors during the strategy period. Besides, it is an unusual accountability institution with great potential for sustainability.

219 GIZ Ghana and IBP staff interviews as part of an OBS evaluation being conducted by the author.

220 Government partner interview

221 CSO interview

222 NRGi outcomes database

NRGI provided little direct funding support to CSOs in Ghana during the 2014-2019 strategy. This was partly because the country office lacked the necessary bandwidth and was focusing on support for PIAC. However, it was also because other DFID funded grant making programs—Ghana Oil and Gas for Inclusive Growth (GOGIG) and Strengthening Transparency Accountability and Responsiveness (STAR-Ghana)—were supporting NRGIs partners. NRGIs was involved in discussions around the design of GOGIG and this resulted in some collaboration with the program. In addition to providing technical support to GOGIG on an ad hoc basis NRGIs concentrated on continuing to support the institutionalization of PIAC, the independent citizen staffed institution that it had catalyzed with funding support for some of PIAC’s citizen staff coming from DFID.²²³

Unfortunately, it was not possible to interview PIAC or GOGIG representatives. But in 2014, NRGIs received a grant to help PIAC develop the structure and systems it needed to become entirely independent. By October 2017, an evaluation funded by DFID established that PIAC had sufficient management capacity to continue as an independent institution.²²⁴ Consequently, NRGIs handed over organizational management responsibility, while continuing to deliver technical assistance to enhance PIAC’s policy analysis. According to NRGIs, this has enabled PIAC to complete several reports raising issues with parliament, the Ministry of Finance and corporations. Also, and importantly concerning sustainability, NRGIs and other civil society actors were successful in advocating for the government to allocate budget to fund PIAC’s operations.

Influencing government budget allocations can be considered a success in terms of NRGIs nurturing an indigenous accountability institution that has been able to diversify its funding base and disclose information to the public. However, current and former staff have different views on the extent to which PIAC is able to mitigate corruption. On the one hand, PIAC has been able to expose the mismanagement of oil revenues and raise key issues with government and this has stimulated public debate.²²⁵ Staff have also signed an MOU with the Economic and Organized Crime Office to further leverage its findings in their criminal investigations. On the other hand, according to a former staff member who knows PIAC well, its power to challenge vested interests and structural constraints is limited. This is a common feature of work in this sector. In his view, NRGIs needs to be doing much more to mobilize citizens to support the work of institutions like PIAC and hold them to account.

The former member of staff also commented that individual NRGIs alumni are stretched too thin, reducing the efficacy of CSO coalitions and other accountability institutions.²²⁶ According to the respondent, they have multiple identities and hold multiple responsibilities within platforms working on extractives. Several senior NRGIs staff remarked that this may be the outcome of significant donor support for work on natural resource governance in recent years that has created a myriad of opportunities for a small cadre of NRGIs alumni. However, it probably also reflects that NRGIs Ghana’s small country team and regional hub are overstretched and thus unable to provide adequate mentoring and accompaniment support.²²⁷ Whatever the case, the issue of CSO coalition efficacy is of concern in the Ghanaian context where the funding that was available for NGOs and made NRGIs opt out of being a grant maker during the past strategy is now diminished.

A final point, one parliamentarian who attended NRGIs Summer School and took part in the survey said that it had enabled him to play a much more meaningful role in debates on fiscal terms and beneficial ownership during debates on the aforementioned E&P Act.²²⁸ Unfortunately, it has not been possible to generate more information on this potentially interesting dimension of the Ghana story and indeed the role of parliaments more broadly, that is stressed in NRGIs theories of action and change.

223 DFID, *2017 Annual Review of: Ghana Oil and Gas for Inclusive Growth (GOGIG)*

224 DFID, *2018 Annual Review Releasing the Transformational Potential of Extractives for Economic Development (RTPEED)*.

225 NRGIs staff comments on draft report

226 CSO partner interview

227 NRGIs staff comments on draft report

228 Parliamentarian survey response

TANZANIA — HAKIRASILIMALI

Results: A political transition has made NRGi's work in Tanzania challenging during the strategy period. NRGi has succeeded in maintaining relationships with reformers in ministries,²²⁹ while Hakirasilimali a Tanzanian (PWYP) CSO coalition that had received significant NRGi support prior to 2015 has continued to demonstrate its capacity, providing high quality comments on several pieces of legislation. These include the 2015 Petroleum Law, the 2015 Revenue Management Law, and a bill centering on Tanzania's entry to the EITI.²³⁰

NRGi continued to provide low levels of financial and institutional support to Hakirasilimali during the strategy period. Hakirasilimali developed significant technical and advocacy capacity prior to 2014, when NRGi also helped facilitate the nascent coalition's engagement with the government in power at the time.²³¹ Because of these achievements, 'Hakirasilimali' was able to attract funding and technical assistance from SDC and Oxfam, reducing its dependency on NRGi.²³² Nonetheless, NRGi continued to provide Hakirasilimali with a small amount of financial support as well as technical advice on institution building. This consisted of helping the Secretariat, which is housed with one of NRGi's partners, Policy Forum to establish human resource management systems. NRGi also continued to offer policy analysis advice, but on an ad hoc, demand led basis. This technical advice was mainly in the area of natural resources revenue management.²³³

Thanks to historic support from NRGi and other actors, Hakirasilimali was able to comment on several pieces of legislation during the strategy period mentioned above. Both the government and parliament commented on the quality of this advice, which helped to further enhance Hakirasilimali's legitimacy, despite the changing nature of civic space in Tanzania. This is unsurprising. In Tanzania resource nationalism is complex and the government still seeks to generate revenues from natural resources.²³⁴ Hence, technocrat reformers are still looking for advice from civil society actors on how to increase mining revenues and NRGi is able to respond through playing a collaborative insider role through strong relations with the Ministry.²³⁵

Despite having developed significant technical capacity that has enhanced its legitimacy, the Hakirasilimali representative interviewed reported that the coalition would still like to engage in regional learning activities facilitated by NRGi.²³⁶ They are also keen to learn from the international experience of countries such as Mexico. This suggests that even though NRGi's support enables significant capacity development, partners are likely to want to continue to avail of NRGi services to improve further still. Moreover, the CSO representative interviewed sees NRGi having an important, ongoing role in developing the capacity of accountability seeking actors in Tanzania. He spontaneously commented on the quality of some of the investigative journalism and attributed this to training conducted by NRGi. He went on to recommend NRGi continue with this support, as he was doubtful that the journalistic capacity developed to date is sustainable.

229 DFID, 2018 Annual Review Releasing the Transformational Potential of Extractives for Economic Development (RTPEED).

230 NRGi, *Nurturing Civil Society Engagement in Tanzania*. (Natural Resources Governance Institute, 2018). resourcegovernance.org/analysis-tools/publications/nrgi-impact-nurturing-civil-society-engagement-tanzania

231 CSO partner interview

232 NRGi *Nurturing Civil Society Engagement in Tanzania*.

233 CSO partner interview

234 Jacob, Thabit, and Rasmus Hundsbaek Pedersen. New resource nationalism? Continuity and change in Tanzania's extractive industries. *The Extractive Industries and Society* 5, no. 2 (2018): 287-292.

235 Interview CSO partner

236 Interview CSO partner

Some respondents believe that NRGIs and Hakirasilimali/Policy Forums' insider role may undermine their ability to support/represent more grass roots based accountability demands and incentives, including those of women.²³⁷ However, it is difficult to judge whether this would be possible in the current context anyway. Hakirasilimali are certainly working on the 'demand side' in their work with parliamentary portfolio committees. However, the respondent I interviewed questioned whether this kind of work was going to be sufficient to ensure citizens benefit from Tanzania's natural resources. He commented on the need to mobilize a 'critical mass of citizens' to get beyond superficial gestures and to engender more significant change in resource governance.²³⁸

²³⁷ Interview independent consultant

²³⁸ Interview CSO partner

Annex 3

Mandatory disclosure data case notes

A user driven approach increases use of mandatory disclosure data in Ghana and Nigeria²³⁹:

Results: NRGi has been experimenting with a contextually and user/problem driven approach to data uptake in Nigeria and Ghana with promising results.

Process: In 2018, NRGi designed a pilot to test the hypothesis that partners will use mandatory disclosure data if it is made accessible in a format that immediately enables them to see its application to the problems they are grappling with and work they are already doing.

During the first phase of the pilot, one of NRGi's global teams worked with focal staff in both country programs. These staff understood local data and media landscapes, as well as potential user needs. They were thus able to collect data, identify contentious issues and areas of potential interest.

The Nigeria program team decided to focus on oil production data. This was likely to be of interest to NGOs working with communities in the Niger Delta. In Ghana, they chose data to enable the Mineral Commission and Supreme Audit Institution to monitor whether the government was collecting mining royalties or not.

Having matched potential data uses to user needs, the focal staff in both countries put together an initial data briefing. In both instances, it provided potential users with examples illustrating how specific mandatory disclosure data could help them with their work. NRGi then invited these potential users to a launch event where they presented the potential data applications. Following this, NRGi facilitated discussions and arranged further collaborations with partners who wanted to deepen their understanding of how they might go about using the data.

The approach to motivating partners worked well in both Nigeria and Ghana. In Nigeria, the brief titled [Nigeria's Oil and Gas Revenues: Insights From New Disclosures](#) was launched at a CSO workshop in Abuja. The Paradigm Leadership Support Initiative (PLSI), a local NGO that works with the Supreme Audit Institution and local communities to encourage citizen participation in public audit was keen to engage.²⁴⁰ Companies operating in the Niger Delta pay a 3% levy to the Delta Commission, which is mandated to spend this money on supporting livelihoods projects in the local area. PLSI's work involves ensuring local community development projects funded by mining revenues received by the Commission are implemented. Therefore, they immediately understood the data's potential.

²³⁹ Most of the data on the story of change is from an interview with the global program staff member involved. Some points from the Ghana case were triangulated by the Ghana Country program. Other sources include blogs and the platform referenced below. The case would be strengthened through additional interviews with non NRGi participants. The purpose of these interviews would be follow up, as well as to triangulate.

²⁴⁰ plsinitiative.org

Initial discussions between NRGi and PLSI confirmed the data's potential. But there was a problem: PLSI lacked the capacity to collect it. Fortunately, NRGi was immediately able to suggest a solution—to build a link with the NRGi ResourceProjects.org platform. This would help PLSI use ResourceProjects.org to update a platform they were developing. The purpose of this platform was to help them compare mining receipts of the Delta Commission with its expenditure on livelihood projects.²⁴¹ It was built on assumptions that if the information and platform are accessible and appropriate, citizens will be able to participate in processes that track expenditure and log negative impacts of projects as well. If it worked, ResourceBenefits could also support the Supreme Audit Institution with its oversight of oil and gas industries.

As far as NRGi was concerned, this collaboration was a win-win. The customized platform, which was endorsed by the Nigerian Extractive Transparency Initiative,²⁴² provided the opportunity for NRGi to intermediate and make ResourceProjects.org more useful. At the same time, it enabled a small NRGi country office to directly support a low-cost approach to community engagement. If the SAI- community monitoring idea worked, the project would also test a vertical integration model. What's more this experience and similar workshops with journalists provided useful feedback on the utility of ResourceProjects.org. The feedback led to immediate adaptations, such as automatic email alerts when new data was released.

The Ghana experiment reveals similarities and differences. The initial brief *How Can Data on Mining Projects Benefit Ghana's Citizens?* was pitched at the SAI and CSOs. Launched at an event attended by CSOs, and government officials including the deputy Chief Executive Officer of the Minerals Commission, the brief garnered immediate attention. A follow up session was also held with the Auditor General with all his deputies in attendance. The Audit Service has a responsibility to audit royalties received from the mining industry.

As luck would have it, one of the deputy Auditor Generals was working on a project that involved estimating royalty payments for a company that was included in the NRGi data briefing at the time. When he saw the data, he was able to verify his estimate. Furthermore, because audit investigations have to be triggered within 9 months of the end of the financial year, he realized that mandatory disclosure of payments to governments data would offer a huge advantage over his existing sources. Mandatory disclosure of payments to governments' data is released much earlier than standard government data.

Therefore, NRGi had a second proof of concept example, which also offered a win-win. The deputy expressed interest in a collaboration between NRGi and the SAI. Given the stature of the collaboration proposed by the deputy, it was likely to gain attention of national government actors and media.

Other participants from the Ghanaian Mineral Commission wanted further engagement and advice on how they could use mandatory company data disclosure when developing a mining fiscal regime later in the year. Oxfam Ghana also wanted to know more and requested further training for their partners. They were working on a project to assess how much revenue district assemblies and traditional councils should be receiving from mining operations. Like PLSI, they wanted to use data to engage communities in monitoring the receipt and expenditure of such funds.

²⁴¹ Alex Malden. *Revenues Benefits: New Nigeria Platform Informs and Empowers Extractives Affected Communities*, (NRGI 2018) resourcegovernance.org/blog/revenues-benefits-new-nigeria-platform-informs-and-empowers-extractives-affected-communities, www.resourcebenefits.ng

²⁴² twitter.com/nigeriaeiti/status/1085492396580896768

These relationships have continued to flourish. The Paradigm Leadership Support Initiative in Nigeria (PLSI) has been successful in generating funds under an anti-corruption program that will sensitize different stakeholders to this data using a combination of television shows, policy briefs, infographics and training.²⁴³ In Ghana NRGi is collaborating with Oxfam and has participated in workshops with CSOs and community-based organizations to establish how this data might be used in their accountability work. They are currently firming up plans that include possibly engaging with Chiefs in the Western region and monitoring the payments for infrastructure payments when companies have stated their intentions to support such investments. NRGi is expected to play an intermediation role in helping communities analyze relevant data.

In Ghana, NRGi was invited to speak at the working group on extractive industries of international organization of Supreme Audit Institutions (WGEI). This workshop focused on how NRGi can get SAs to use such payment in their oversight function. Since then WGEI has been exploring with NRGi other opportunities to support SAs.²⁴⁴ NRGi Ghana plans further training activities with the Audit Service in 2020 on different resource governance data tools, including resourcecontracts.org.

In conclusion: both projects in Ghana and Nigeria prove the hypothesis that if NRGi analyses user needs and then intermediates to show potential users applications that address existing problems, data uptake is likely. Another lesson is that the pilot benefited from country program staff taking lead roles and leveraging local relationships. There are encouraging signs that the CSOs and audit authorities are going to take this further. However, as of yet there is no evidence on whether the intermediation taken by PLSI and Oxfam Ghana have been as successful in engaging citizens or eliciting government response. Going forward, it is important NRGi keeps monitoring the success of these initiatives, since evidence on ordinary citizens finding such platforms appropriate, accessible and relevant is relatively thin. Moreover, they can be prone to elite capture.

²⁴³ NRGi Global staff interview

²⁴⁴ Staff comments on draft report