

The Honorable Mary Jo White  
Chair  
U.S. Securities and Exchange Commission  
100 F Street NE  
Washington, DC 20549-1090

Monday, 14 April 2014

**Re: SEC rule implementing the Dodd-Frank Act (Section 1504)**

Dear Chair White,

We are a group of 544 civil society organisations from 40 countries, united by the Publish What You Pay (PWYP) Campaign and writing to urge the Securities and Exchange Commission (SEC) to re-issue an implementing rule for the Dodd-Frank Wall Street Reform and Consumer Protection Act (Section 1504) that aligns with the EU Accounting and Transparency Directives, with no country exemptions and full public disclosure of payments, without delay.

We, the signatories to this letter, represent the depth and breadth of the PWYP Campaign, including human rights, faith-based, anti-corruption and environmental organisations. We are from countries rich in natural resources, but blighted by corruption, conflict and poverty. We see on a daily basis the destructive effects that poor governance of natural resources has on our communities. Greater transparency of extractive industry revenues will reduce natural resource related corruption and conflict, and help ensure these resources are transformed into lasting public benefits.

We commend the SEC for its dedication in developing Section 1504's original implementing rule, which followed Congress's clear intent to make publicly available detailed information regarding revenue payments made to governments worldwide. We are extremely disappointed that a U.S. District Court vacated the rule.

However, the Court's ruling does not preclude the SEC from requiring full public disclosure of project-level payments or denying exemptions, and we believe the SEC has the discretion to retain these critical provisions in the final rule, as long as sufficient justification is given.

Project-level reporting will bring great benefits to citizens' groups in resource-dependent countries. Some of the signatories to this letter work in areas where numerous extractive companies are active, and in order to ensure that each company is meeting its fiscal obligations to the host government and community, we need to know the identity of individual company making the payment.

In other areas, a single company dominates production and makes numerous payments that arise from individual projects. Citizens in these areas need to be able to identify which project

each payment originates from in order to be able to meaningfully monitor individual payments, which can reach up to US\$1 billion. As the original 1504 rule recognises, contracts provide the basis for determining the payments that arise from resource projects. As such, the SEC should ensure that the final rule requires contract-based project-level reporting, so that communities are able to track payments from project to government.

Conversely, publishing compilation reports of data aggregated from multiple projects or keeping company names hidden from public view would deprive citizens of this vital information, allow extractive firms to hide questionable payments behind aggregated and anonymised data, and defeat the purpose of the Section 1504 law.

The importance of full project-level transparency is heightened further in areas where local revenue-sharing agreements are in place. In the Democratic Republic of Congo, for example, national law stipulates that 25% of tax revenues from individual mining projects should go back to the province, and 15% back to the local territory or town where development takes place. However, communities are currently not in a position to claim the tax money they are entitled to, as there is no way of knowing how much a given local project is generating in taxes.

Similarly in the Philippines, indigenous communities have a legal right to a minimum of 1% of royalties from mining in their ancestral domains. However, none collect this full amount, and there is little revenue transparency to help them do so. Project-level reporting would help communities to collect their entitlements, as well as help the government keep track of the royalties generated.

By helping to usher in a new era of stability and prosperity in resource-dependent countries and contributing to global energy security, Section 1504 will also deliver benefits for investors and companies. In order to achieve these positive results, the final rule must:

- ensure full public disclosure of payments, including the identity of reporting companies;
- require contract-based project-level reporting;
- include no country exemptions; and
- set a reporting threshold of US\$100,000.

This would align the U.S. with the global standard for extractive revenue transparency, which includes the EU Accounting and Transparency Directives, as well as similar legal developments in Norway and Canada.

The United States has shown great leadership in the field of natural resource transparency, for which the communities we work with and represent are extremely grateful. Kofi Annan, Chair of the Africa Progress Panel, has urged the SEC to maintain its high transparency standards, and described efforts by the American Petroleum Institute to prevent meaningful disclosure as a “blip on the road to greater transparency.”

We sincerely hope the SEC will continue to support progress towards a global transparency standard by moving swiftly to produce a strong final rule, which will help achieve the goals of reducing corruption, poverty and instability in resource-dependent countries.

On behalf of the Publish What You Pay Coalition,

Marinke van Riet, International Director, Publish What You Pay

## **AFRICA**

### **Burkina Faso**

Hien Jonas, Organisation pour le Renforcement des Capacités de Développement  
Tiergou Pierre Dabiré, Réseau Africain des Journalistes pour l'Intégrité et la Transparence

### **Cameroon**

Dupleix Kouenzop, Dynamique Mondial des Jeunes  
Justin Mabout, Service National Justice et Paix  
Jaff Napoleon Bamenjo, Réseau de Lutte Contre la Faim  
Samuel Nguiffo, Centre pour l'Environnement et le Développement  
Ernest Nkolo, Acting For Guaranteeing Governance In Economy And Society  
Ndi Richard Tnto, Service OEcuménique pour la Paix

### **Central African Republic**

Josephe Bindoumi, Ligue Centrafricaine de Droits de l'Homme

### **Chad**

Maoundonodji Gilbert, Groupe de Recherche et de Monitoring du Projet Tchad/Cameroun  
Abbé Madjiro Raymond, Commission Nationale Justice et Paix  
Mekombe Thérèse, Association des Femmes Juristes du Tchad  
Abdoulaye Djibrine, Commission Permanente pétrole N'Djaména  
Nailar Clarisse, Cellule de Liaison des Associations Féminines  
Nadji Nelambaye, Commission Permanente Pétrole Locale  
Mognan Ngaba, Association Tchadienne pour la Non-Violence  
Marie Larlem, Association pour la Promotion des Libertés Fondamentales au Tchad  
Me Jacqueline Moudeina, Association Tchadienne pour la Promotion des Droits de l'Homme  
Pafing Guirki, Tchad Non – Violence  
Renodji Djimrabaye, Réseau de Suivi des Activités Pétrolières au Moyen Chari  
Limassou Saleh, Réseau des Organisations de la société civile en Appui à la Population au Mayo Kebby  
Andreas Yoh Pudens, Association pour la Promotion des Initiatives à la base  
Baldal Valentin, Ligue Tchadienne de Droits de l'Homme  
Barka Michel, Union des Syndicats du Tchad

### **Congo Brazzaville**

Brice Makosso, Commission Nationale Justice et paix  
Christian Mounzeo, Rencontre pour la Paix et les Droits de l'Homme  
Samuel Nsa, Fondation NIOSI

### **Democratic Republic of Congo (DRC)**

Me Jean Claude Katende, Association Africaine de Défenses des Droits de l'Homme

Carine Ketsia, Alternative Citoyenne pour les Droits de l'Homme  
Scholastique Atadra, Femmes et justice économique  
Léonie Kandolo, Protection Enfants SIDA  
Félicien Mbikayi, Conseil National des ONG

### **Gabon**

Me Paulette OyaneOndo, Centre pour la promotion de la Démocratie et la Défense des Droits de l'Homme  
Georges Mpage, Réseau des Organisations Libres de la société civile pour la Bonne gouvernance  
Marc Ona, ONG Brainforest

### **Ghana**

Solomon Kusi Ampofo, Friends of the Nation  
Mohammed Amin Adam, African Center for Energy Policy

### **Guinea**

Mamadou Taran Diallo, Association Guinéenne pour la Transparence  
Kabinet Cisse, Centre du Commerce International pour le Développement  
Gadiri Diallo, Organisation Guinéenne des Droits de l'Homme  
Moussa Iboun Conte, Association Guinéenne des Editeurs de la Presse Indépendante  
Oumar Béla Diallo, Union Syndicale des Travailleurs de Guinée  
Elhadj Sékou Oumar Ly Diallo, Confédération Nationale des Travailleurs de Guinée  
Aicha Barry, Coalition Nationale de Guinée - Droit et Citoyenneté des Femmes  
Aboubacar Sylla, Centre Africain de Formation pour le Développement  
Alpha Abdoulaye Diallo, Réseau Afrique- Jeunesse de Guinée

### **Ivory Coast**

M. Kouassi Hyacinthe, Social Justice  
M. Yoboue Michel, Groupe de Recherche et de Plaidoyer sur les Industries Extractives  
Mme Kouame Amani Claudine, Genre Développement et droits Humains  
Mme Abe Zouzou Nicole, Association des Femmes Juristes  
M. Noman Noël, Centre d'Actions pour le Développement Social  
M. Kongoue Kouassi Mozart, Aide, Assistance et Développement Communautaire  
M. Silwe Segorbah Michel, Centre de Recherche et de Formation sur le Développement Intégré  
Kouame Adjoumani Pierre, La Ligue Ivoirienne des Droits de l'homme  
Maître Yacouba Doumbia, Le Mouvement Ivoirien des Droits Humains

### **Kenya**

Maurice Ouma Odhiambo, Jamaa Resource Initiatives  
Charles Wanguhu, Kenya Civil Society Platform on Oil and Gas

### **Mali**

Souleymane Dembélé, Coalition des Alternatives, Dettes Développement  
Tiémoko Souleymane Sangaré, Fondation pour le Développement au Sahel  
Mme Coulibaly Salimata Diarra, Association des Consommateurs du Mali  
Madame Traoré Oumou Touré, Coordination des Associations ONG Féminines

Aliou Haïdara, Mining News  
Me Moctar Mariko, Association Malienne des Droits de l'Homme  
Madame Touré Djénébou Sidibé, Réseau pour le Développement Local et l'Autopromotion de la Femme  
Souleymane Dembélé, Guamina  
Famory Jean Kamissoko, Association Malienne pour la Protection de l'Environnement (STOP – SAHEL)  
Ibrahim Labass Keita, Réseau des Journalistes pour l'Annulation de la Dette  
Ibrahima Koreyssi, Clinique Juridique Demeso  
Moussa Kounandy Traoré, Bureau d'Expertise de Management et Concertation  
Mme Keita Mariam Touré, Amnesty International-Mali  
Tiémoko Souleymane Sangaré, Conseil de Concertation des Actions des ONG  
Mori Moussa Konaté, Secrétariat de Concertation des ONG  
Alexis Kalambry, Journal "Les Echos" (Jamana)

### **Mauritania**

Fatma Khoubah, Réseau Mauritanien pour la Promotion des Droits de la femme  
Samory Ould Beye, Confédération libre des travailleurs de Mauritanie  
Maroufa Diabira, Groupe d'Etudes et de Recherches sur la Démocratie et le Développement Economique et Social  
Aissata Satigui Sy, Association mauritanienne des droits de l'homme  
Mme Ba Khadjetou Diagne, Confédération générale des travailleurs de Mauritanie  
Me Mohamed Lemine Ould Bah, Ordre des Avocats  
Kane Mocktar, Union des syndicats libres de Mauritanie  
Sadvi Ould Cheikh, Union nationale des travailleurs de Mauritanie  
Omar el Moktar, Association nationale de la presse indépendante  
Aminetou M/ Ely, Association des Femmes Chefs de Famille  
Boubacar O Mohamed, SOS / Esclaves  
Lalla Aicha Sy, Comité de solidarité pour les victimes des violations des droits humains  
Mohamed Abdellahi Bellil, Editeurs de la presse indépendante  
Tislim Mint Moktar, Union des travailleurs de Mauritanie  
Me Mine O Abdoullah, Ligue mauritanienne des droits de l'homme  
Irabiha M Abdel Wedoud, Forum national pour la défense des droits de la femme  
Mohamed Khamess, Mer Propre  
Khattou mint Baham, Cyber forum  
Nedwa Mint Moctar Nech, Mauritanie 2000  
Saar Mamadou Moctar, Forum national des organisations des droits humains  
Ba El Hadj, Association mauritanienne pour l'auto développement  
Cheikh Med Lemine Ould Ely, Mer Bleue

### **Niger**

Ali Idrissa, Comité de Réflexion et d'Orientation pour la Sauvegarde des Acquis Démocratiques  
Gadeize Fatouma, Mouvement Nigérien pour la Défense des Droits de l'Homme et des Peuples  
Bagna Aissata Fall, Association Nigérienne de Lutte Contre la Corruption section de Transparency International  
Saouna Inoussa, SOS Tabagisme

Zakari Hamadou, Association de Lutte Contre le Travail des Enfants  
Ousmane Soyata, Genre Environnement Santé et Pauvreté  
Mansour Dado, Confédération Générale Syndicale Libre  
Mano Aghalo, Hed Tamate ONG de Développement  
Almoustapha, Alhacen Aghir In Man (Bouclier de l'âme)  
Sako Mamadou, Confédération Nationale des Travailleurs  
Naomi Stansly, Tedhelte  
Mariatou Amadou, Metissage - Niger  
Mohamed Boucha, Nomade Afrique  
Abdourahamane Ousmane, Réseau des Journalistes pour les Droits de l'Homme  
Albert Chaibou, Réseau des Journalistes pour les Questions de Sécurité et de Paix  
Maikoul Zodi, Mouvement des Jeunes Républicains  
Malam Saley Abdourahamane, Réseau des Jeunes pour la Sauvegarde de l'Environnement  
Lawaly Zakari, Action-Jeunesse-Développement  
Abdoulaye Seydou, Réseau Panafricain pour la Paix, la Démocratie et le Développement  
Hamadou Oumarou, Les Amis de la Terre  
Amadou Salifou, Association des Radios et Télévisions Indépendantes

## **Nigeria**

Elder Ogazi Emeka, Transparency and Economic Development Initiatives  
Shaikh Salahuddeen Busairi, World Islamic Peace Foundation  
Ada Agina-Ude, Gender and Development Action  
Taiwo Otitolaye, Community Outreach for Development and Welfare Advocacy Nigeria  
Faith Nwadishi, Koyenum Immalah Foundation  
Mohammed Mustapha, Democratic Action Group  
Auwal Ibrahim Musa, Zero Corruption Coalition  
Babatunde Adebgesan, Geo Sciences  
Angela Okoye, Organization for the Sustenance of Nigerian Environment  
Auwal Ibrahim Musa, Civil Society Legislative Advocacy Centre  
Areola Joseph, Grassroots Action for Development  
Saka Idris, Community Action Project  
Becky Tsado, Women Initiatives for Development  
Otive Ibuzor, Centre for Leadership and Strategic Studies  
Egr Adamu Iornenge Kunti, Benue dams and Development  
Barrister Omale Omale, Democratic Front Renaissance  
Theresa Ogbaje, Convergence for Credible Democracy  
Monica Ikye, Women Emancipation  
Barrister Gbagir, Justice Initiative  
Emeka Ogazi, Transparency and Economic Development Initiatives  
Ambs/Engr Muhammad N. Ibn – Ahmad, Centre for Peace Projects & Development  
Sadiq Ibrahim, CODEA, Gombe  
Hadiza Mohd, Women Rights Initiatives, Damaturu  
Hussaini Adamu, Toungo Youth Development Association  
Mohammed G. Wuyo, BOCODEP  
Ibrahim Emos, Rahama Women Development Programme  
Suzan Cosmos, Taraba  
David Ugolo, Africa Network for Environment & Economic Justice  
Lilian Achin, Fiscal Transparency and Accountability Initiative

Abdulkareem Tijani, African Centre for Citizens Orientation

### **Senegal**

Ibrahima Sory Diallo, La Lumière  
Abdoul Aziz Diop, Forum civil  
Ayni Aw, Rencontre Africaine pour la défense des droits humains  
Mouhamadou Gaye, Plateforme des acteurs non étatiques  
Amadou Sy, FASD  
Aly Sagne, Lumière Synergie Développement  
El hadj Abdoulaye Seck, Amnesty International/Sénégal  
Moussa Cissokho, Représentant des communautés minières  
Tabara Cissokho, AKAD Kédougou  
Gaspard Onokoko, Gra Redep  
Oumy Mbacké Sangaré, Chambre de commerce de Thiès  
Boubacar Tamba, AGERNA

### **South Africa**

Johnlyn van Reenen, Economic Justice Network of FOCCISA  
John Capel, Bench Marks Foundation  
Kwasi Adu-Amankwah, The International Trade Union Confederation of the African Region  
Thembi Mngomezulu, Public Services International  
Ritta Thandeka Msibi, Democratic Nursing Organisation of South Africa  
Stephen Faulkner, South African Municipality Workers Union  
Nokuzola Dorothy Ndhlovu, Health & Other Service Personnel Trade Union  
Daniel Komape, National Union of Public Service and Allied Workers  
Nomthandazo Sikiti, National Education, Health & Allied Workers Union

### **Tanzania**

Armachius Msafiri, Africa International Group of Politics Risk Analysis  
Moses Kulaba, Agenda Participation 2000  
Peter Bayo, Arusha NGO Network  
Eliezar L. Emmanuel, Beach Management Unit - Bukoba Village  
Eliezer Kashaga, Beach Management Unit - Bukoba Urban  
Elias Mwashuiya/Mr. Baraka Saiteu, Centre for Environmental Law and Governance  
Elias Masamaki, Chama cha Walemavu Tanzania  
Songoro Kasisisko, Civic Education Tanzania Trust  
Bubelwa E. Kaiza, Concern for Development Initiatives in Africa  
Jonathan Karuguru, Extra Journals Network  
Romuald Z. Rwechungura, Forum on Anti-Corruption Initiative in Tanzania–Trust  
John Benedict Mosha, Kigoma and Ujiji Non- Governmental Organisation Network  
Rukia Selemani, Kigoma Development Initiative  
Shida Salum, Kigoma Kasulu NGO Network  
Edward Ludengama, Lake Tanganyika Development and Relief Organisation  
Stanslaus Komba, Langiro Environmental Protection Association  
Albert Rugemeleza Nshalla, Lawyers Environmental Action Team  
Hellen Kijo Bisimba, Legal and Human Rights Centre  
Prisca Yohana Unga, Lindi Support Agency for Welfare  
Manfred Sabas Mbele, Msamala Environmental Conservation Association

Allan Peter Mkopoka, Mtwara Region NGO Network  
Petro P. Ahham, Multi Environmental Society  
Hassan Maulid, Muslim Council of Tanzania  
Michael Wilson Sadiki, Nindai Poverty Alleviation Association  
Trine Hveem, Norwegian Church Aid  
Alex Mbwilo, Sakale Development Foundation  
Antony Ngige, Swiss Aid - Tanzania  
Jonathan S. Karuguru, Tanzania Volunteering Centre  
Hebron Mwakagenda, The Leadership Forum  
Novath Rukwago, The Tanzania Federation of Disabled People's Organizations  
Edward Nfundizeki, Traditional Fishing Group (FG) - Bukoba  
Edward B. Simon, Umoja wa Wawezeshaji Kioo Ilagala Kigoma

## **Togo**

Todzro Mensah, Les Amis de la Terre-Togo  
Binta, Groupement de Recherche et d'Action pour le Développement Social et Economique  
Ayibatchao Jacqueline, OTIS-Togo  
Clumson-Eklu Etsri Hihédéva, Association Togolaise des Droits de l'Homme  
Gbodjo Kodjo Edouard, Association pour la Promotion de l'Education de Base  
Aimé Adi, Amnesty International-Togo  
Massassaba Aminou, Association pour la Taxation des Transactions Financières et pour l'Action citoyenne  
Bechodro-Ngatimon Thai, Jeunes Volontaires pour l'Environnement  
Adessou Kwaku Sena, Institut Africain pour le Développement Economique et Social (Inades Formation)  
Barimédie Kossi, Réseau des Organisations pour la Protection des Enfants  
Tchacondo Boutehou, Centre d'Etude et de Recherche en Médecine Traditionnelle Appliquée  
Etchri Sassou B. Koffi, Institut Alternatif aux Modèles et Méthodes de Développement Economique et Social-International au Togo  
Elly Yawo Holali Hivers, Association Togolaise de Défense et de protection des Droits de l'Homme  
Charles Ayetan, Communication et Développement Intégral-Togo  
Dermane Saoudatou, Action Base de Développement  
Kossi Agboh, CLM-CBI  
Franck Kepomey, Centre Africa-Obota  
Nbebi Komi, Association des Riverains des Mines de Bangéli  
Tengue Koffi, Organisation Jeunesse pour le Développement Communautaire  
Kpondzo Yao, Observatoire Ouest Africain de l'Environnement  
Etse Kuami, Groupement de Gestionnaire pour le Développement  
Megbnya Raphael, Volontaire en Action pour la Santé et l'Épanouissement  
Claire Quenum, Coordination pour le Suivi - Évaluation par la Société Civile  
Kougblenou Kossi, Association pour l'Autopromotion des Communautés de Base  
Edem Sowu, West Africa Network of Peacebuilding  
Norbert Amouzou, Syndicat Démocratique des Mines  
ABI Samir, Visions Solidaires



## EURASIA

### **Azerbaijan**

Sahib Mammadov, Citizens' Labor Rights Protection League  
Nesrulla Nurullayev, "Care for the Elderly Intellectuals" Public Union  
Alibey Zeynalov, "ARAN" Human Rights Resource Center  
Rovshan Novruzov, Ganja Children Foundation  
Khalid Kazimli, Regional Human Rights and Media Center Social Union  
Aytekin Imranova, Islam, Democracy and Human Rights Center  
Ahmed Abbasbeyli, Development Society and Civil Relations" Public Association  
Azer Babayev, Support Center for Civic Initiatives Social Union  
Aslan Valiyev, Azerbaijan National Committee Of Helsinki Citizen's Assembly  
Akif Huseynov, Modern Development and Legal Aid Center  
Alovsat Sadigli, Education Research Center Public Union  
Razi Nurullayev, "Region" International Analytical Center  
Mirvari Gahramanli, Oil Workers' Rights Protection Organization Public Union  
Vusala Huseynova, Young Democratic Reformers Public Union  
Shukur Izzatoghlu, Public Union of Regional Human Rights and Social Research Center  
Galib Bayramov, Economic Research Center  
Telman Malikzade, "Assistance to Social and Cultural Development of the Youth" Social Union  
Shakarkhanim Aliyeva, Gender Equality Public Union  
Sevil Yuzbashova, Eco-World Public Union  
Elshan Naghiyev, Center for Citizen Initiatives and Legislation Improvement  
Arzu Soltan, Fərdi üzv  
Rafael Bejanov, Human Rights and Enlightenment Social Union  
Fuad Badirli, Research Center Against Torture  
Fikrat Jafarli, Human Rights And Law Enlightenment Public Union  
Akif Gurbanov, Election Researches Center  
Elchin Abdullayev, Democratic Institutions and Human Rights Social Union  
Sevil Allahverdiyeva, Center of Women's Problems Research CWPR  
Yashar Aghazade, Azerbaijan Committee for Human Rights and Defense of Freedoms  
Mahammadhasan Hasanov, Public Union for solving social-economic problems of Mortar Victims  
Alasghar Huseynov, Regional Development and Human Rights Public Union  
Nabi Rahimov, Legal Aid Center to Oilworkers  
Sadig Hasanov, "Ecolife" Public Union  
Ruslan Atakishiyev, Studying of Economic Resources Public Union  
Zohrab Ismayil, Public Association for Assistance to Free Economy  
Anar Orujov, Caucasus Media Investigations Center  
Zaur Akbar, "Youth Club" Public Union  
Ilgar Huseynli, Social Strategic Studies and Analytically Investigations Public Union  
Mehriban Aliyeva, Regional Woman Initiatives Social Union  
Ilgar Nasibov, Democracy and NGO's development Resource Center  
Ogtay Gulaliyev, Society for Democratic Reforms  
Vugar Huseynli, Democratic Initiatives and Social Development Public Union  
Taleh Aliyev, Public Union for Civil Society Institute  
Telman Dadashov, "Progress" Sosial Development Public Union

Shargiya Dadashova, "Regional Gender Center" Public Union  
Niyaz Yagublu, Development Watch Research Center Public Union  
Alimamad Nuriyev, "Constitution" Researches Fund  
Asif Yusifli, "Care for disabled persons of Garabagh War" Society  
Azer Rasul, Foundation of Legal Initiative and Enlightenment of Democracy  
Samir Hasanov, "Ulduz" Electron Organization  
Novruz Mammadzade, "Zangilan" Public Union  
Mubariz Taghiyev, Human Rights in the Extractive Industry Public Union  
Lankaran Aliyev, Road Construction Monitoring Center  
Elshan Nasirov, "Elektron Election" Public Union  
Araz Aslanlı, Caucasian Center for International Relations and Strategic Studies  
Iraga Yagubova, "ELS" Independent Research Center  
Malahar Murshudlu, Independent Teachers Union of Azerbaijan  
Mehriban Vazir, Center of Political Culture for Azerbaijani Women  
Irshad Abbasov, Eco-Renessans Public Union  
Latafat Islamgizi, Regional Human Rights and Education Center  
Ganimat Mammadov, "Education of the Young Generation" Public Union  
Fidan Magsudov, Modern Woman and Society Public Union  
Azer Mehtiyev, "Ekspert" economic magazine  
Rushangiz Huseynova, "Solidarity Among Women" Social Union  
Konul Aghayeva, Digital Development Public Union  
Mahammad Talibli, Economic Innovation Center  
Azer Asgharov, "Support to Young Poets" Public Union  
Nuraddin Ismayilov, "Rescuer" Public Union  
Jalal Amanov, "Progress" Social Research Public Union  
Samad Hatamov, "Return to their Place" Public Association  
Ingilab Ahmadov, Public Finance Monitoring Center  
Sabit Bagirov, Economic and Political research Center  
Ilham Shaban, Caspian Barrel Research Center  
Sabuhi Gafarov, Free Person Human Rights Protection Society  
Sevgim Rahmanov, Merchants and Producers' Union  
Vugar Bayramov, Economic and Social Development Center  
Avaz Hasanov, Society Humanitarion Research  
Ramin Hajili, Dalgha Youth Movement

### **Kazakhstan**

Asiya Kurmanbayeva, Committee for Public Control over the execution of government programs at the local level  
Arthur Shahnazaryan, North Caspian Press Club  
Adylbek Kozybakov, Koldau Kazakhstan  
Oksana Martynuk, Caspian-Info  
Eduard Nazarov, Central - Asian Institute for Development  
Sara Espenova, NGO Kameda  
Vladimir Litvinov, Ecology-Youth-Development Initiative  
Natalia Malysheva, NGO Komek  
Meresh Sharipova, NGO Shapagat  
Galim Ageleuov, NGO Liberty  
Murat Tungishbaev, NGO Koz Ashu

Alla Zharkimbaeva, NGO Together Against Cancer  
Imanaliev Kairat, NGO of disabled people with higher education "Namys"  
Kasabulatova Sania Mukhametbekova, Taldykorgan Regional Centre for Democracy  
Daukenov Amanzhol Mizambaevich, Public Association "Movement of Baikonur"  
Golendukhin Yevgeniy Vladimirovich, Public Association "Regional Center of New Information Technologies"  
Gulbarshin Kasimanovna, Public Foundation "Continuous Education Fund"  
Platonova Alla Mikhailovna, Public Foundation "Nezabudka"  
Yantsen Natalia Alekseevna, Public Association "Formation of tax culture"  
Lobachov Pavel, Public Association "Echo"  
Yerkaeva Nina Fedorovna, NGO "Education and Development"  
Sydzykova Saltanat Yeleusizovna, NGO "Society of women - small entrepreneurs"  
Osin Kirill Vladimirovich, NGE "Eco Mangistau"  
Ushakova Svetlana Borisovna, Public Foundation "INMIR"  
Bakut Tumenova, PF "Aman saulyk"  
Asakaeva Dana, Republican Association "Shanyrak"  
Chernova Galina, NGO "Centre for Environmental Law Initiative "Globus"  
Mustaphin Zhanat Khalievish, NGO "Social Analytics"  
Meruert Kurmasheva, PF "Eco Centre"  
Oksana Volkova-Mikhalskaya, NGO "Women's ray", Stepnogorsk  
Kizhegaleev Adilzhan Zhumanovich, PF "Kuretamyр"  
Zhandosova Zhanar, NGO "Center for Research "Sange"  
Kurtavtseva Ludmila, PA "Otrazhenie"  
Kuanish Serik, PA "ASIP"  
Seydaliyeva Aknur, Association of Teachers zhy Iyoyskogo - district  
Utepkaliev Serik, OO "Ayala ort"  
Abylov Oralbai, PA "Barys - Densaulyk clubs"  
Victoria Lee, PA " Batis information»  
Yuri Krivodanov, PA "Blessing"  
Kizatova Tokzhan, OO "Demos"  
Zharylkasynova Dametken, PA Zhambylsky Committee on Human Rights  
Hamza Ruslan, OO "Jas buyn"  
Anosov Svetlana, PA "Zhasyl gave"  
Murzatov Kanatbek, PA "ZhezSat"  
Nauryzbayeva Gulmira, PA "Zurek Zhylu"  
Nurgazieva Asel, PA "Zaman"  
Khakimov Makhambet, OO "Caspian Tabigat"  
Nurgazy Shinar, PA "Kol oner"  
Kozybakov Adilbek, PA "Magystau Tabigat"  
Ivaskevich Natalia, PA "Megalopolis"  
Nurzhitova Kulbarshin, PA "Mugedek elemi"  
Tnaliev Ulugbek, PA "NPK"  
Konar Sisen, NGO "Society of Veterans of Afghan war"  
Sydzykova Saltanat, NGO "Society for Women small business"  
Garzhauov KUDABAEV, PA "Oralman zhiyyk"  
Ademe Ilyasova, PA "Otandastar"  
Kamasheva Gulbakhyt, PA "Taza Sailau"  
Koshelekova Svetlana, PA "Taraz Press Club"

Zheng Valentine, PA "Tomiris"  
Kanatbaev Amankos, PA "Sharapatty shanyrak"  
Tomilova Natalia, PA "Miner Family"  
Askar Aktleuov, PF "Tilshi"  
Dzhakupov Kuantay, PF "Adamgershilik"  
Karashin Becket, PF "Alshy"  
Max Bokaev, PF "Arlan"  
Bissenova Jibek, PF "Bolashak"  
Sarsenbayev Shynarbek, PF "JYLY - Demeu"  
Shvetsov Elena, PF "Youth Information Service of Kazakhstan"  
Bondarenko Tamara, ALE "Bayrak"  
Kemalov Meyrambek, NC "Demorda"

### **Kyrgyzstan**

Moldogaziyeva Kaliya, "Tree of Life" HDC  
Ismailova Tolekan, Citizens against corruption  
Mambetov Shergazy, Association of mining operators and geologists of Kyrgyzstan  
Sarybayev Rysbay, "Altyn Bulak" NGO (Naryn)  
Atabekov Turgunbek, "FOAT" Public Association (Chatkal)  
Bekturova Arsar, "Karek" Public Association (Issyk-Kul)  
Madzhikov Zhyrgal, "Bai Too" NGO (Issyk-Kul)  
Imanbekova Nazik, "Elnaz" Centre of Information and Human Resources (Talas)  
Toktosunova Ryskul, Health and Education of the XXI century Youth (Talas)  
Iskanov Ulanbek, "Kozhoy-Serek" (Batken)  
Amatova Nurzhamal, "Agrotechnology" Public Foundation (Osh)  
Beirshanova Lyubov, Issyk-Kul State University named after Tynystanov, Ecology Department  
Beyshe uulu Kachyke, "Manas Murasy-El Kamy" (Chaek Village)  
Momuntayeva Arzykan, Ombudsman for the Talas Region  
Niyasaliyev Muratbek, "Talas Regional Youth Council" Public Association  
Alymov Abdrashid, Ala-Buka ayyl okmotu  
Karymshakov Chyngyz, "Lawyer and Co." Public Foundation (Sulyukta)  
Murat Shamil, Coalition for Democracy and Civil Society (Talas)  
Zhenishova Altynay, "Sedep" Public Association (Kazarman)  
Temirberdiyev Abdylida, "Marendan" Public Foundation (Chon Alay)  
Kudaybergenov Kurmanbek, Naryn Municipal Resource Centre  
Kanybek Isabayev, Aarhus Centre (Osh)

### **Tajikistan**

Juraeva Shahlo, PA "Dzhahon"  
Makhmudov Rahimjon, PA "Analytical and Advisory Centre"  
Tojinisso Azizov, OO "Hukukshinson"  
Michael Petrushkov, Assosiatsiyai "Markazi Rushdie Sohibkor Chumhurii Tochikiston"  
Konstantin Bondarenko, Center of the free market of Tajikistan  
Zarina Khalikova, Center for Training and support to NGOs  
Dodarbekov Saidaliyev, NGO Shahrvand  
Bahram Mamadaliev, NGO Tabiati toza  
Shaikat Azamov, NGO "Center for Community Development"

Zohra Sharipov, PA "Madad"  
Sangak Rakhmonov, NGO Punbachi  
Ogonazar Akanazarovich Aknazarov, NGO Ecocenter "Pamir"  
Anna Shukurova, NGO "Union of professional consultants in Tajikistan"  
Ali Akbar Abdulloev, NGO Center for Anti-Corruption Education and Promotion  
Oshtii Milli, NGO Hurinisso Gafforzoda  
Karimov Mavzuna, Centre for Social-economic and educational development  
Muazzama Burkhanova, Foundation "Dastgir Center"  
Sangakov Saidhodzha, NGO Agrofond  
Rustam Gulov, NGO GIV Accent  
Payrav Saidov, NGO Calidi Donish  
Mirzoeva Mayram, NGO Fayzbahsh  
Tursunoi Isomidinova, NGO Nilufar  
Rano Dzhumaeva, NGO Tomiris  
Dilshod Alimov, Tajik Association of Promotion of Tourism  
Tuhfa Sadykova, NGO Dyer

### **Ukraine**

Olena Pavlenko, Dixi Group  
Vladislav Deyneko, Analytical Center of Regional Cooperation  
Altukhov Vadim, Public Control

### **MIDDLE EAST & NORTH AFRICA**

#### **Iraq**

Ali Mohammad Neema, Rafidai Al Iraq Organisation  
Mohammad Adnan Kahtan, Akad Cultural Institute  
Dr, Ghaith al Janabi, Mercy Hands Organisation  
Saadeeya Al saalihi, Together to Protect Man and Environment Organisation  
Khaldoun Kubba, Iraqi Organisation for Reconstruction  
Muqdad Al Difaa'e, Association for University and Institutes Graduates in Iraq  
Abdullah Hajji, Al Ikhaa2 Democratic Organisation  
Ibtissam Al Shammari, Women for Welfare of Women Organization  
Kassem Madhari, Iraqi Center for Human Rights Activists  
Kifaah Al Jawahiri, Al Amal Iraqi Association  
Ali Abboud, Rafiday Association for Human Rights  
Sanaa Al Tai, Democratic Women Organisation  
Firyal Al Kaabi, Awan Capacity Building and Raising Awareness Org  
Ahmad Shammari, Al Hubouby Institute for Iraqi Youth and Students  
Yahya Hafeth, Syndicate for Engineers  
Abdel Bari Salmaan, Union for Businessmen, Ninawa branch  
Bassem Antoine, Union of Businessmen, Baghdad  
Ibrahim Ibrahim, Al Massala Organisation for Human development  
Alaa Al Asadi, Eternal Fire Center for Oil Development  
Tahseen Al Mawla, Association of Journalists and Young writers, Iraq  
Imad AL Timimi, Center for Corruption Detection  
Amina Ali, Iraqi Institute

Abeer Ibrahim, Arab Youth Organisation  
Maher Al Obaidi, Association for Children rights and Family Protection  
Khaled Nakshbandi, Towards Citizenship Organisation  
Haydar Battat, Al Huda Organisation for Strategic Studies, Missan  
Salah Saleh, Al Rafiday Institute for Civic Culture  
Nidal Abboudi, Mawtinee Organisation  
Jalal Hourteen, Transparent Work to Fight Corruption  
Ahmad Khafaji, Committee to Support Integrity  
Hamza Al Qureishi, Inmaa2 Center for research and Studies  
Dr. Muqdad Al Jabari, Iraqi Economic Reform Institute  
Salem Al Soudani, Koufan Organisation for Human rights and Democracy  
Bahaa Al Azzawi, Union for Iraqi Youth Collaboration  
Hadi Shwaykh, Ashour Institute for Development and Sustainability  
Mohammad Jabbouri, Al Haq Organisation  
Imaan Al Laami, Independent Amal Association  
Maytham Al Khazaali, Scientific Assembly for Education and Rehabilitation  
Dr. Qusay Abboud, Tawasul Organisation for Development  
Haidar Al yasiri, Ishtaar Organisation for Peace  
Taha Abdel Ghani, Al Safa association for Development across Cultures  
Adnan Al Shaukraji, Al Rafiday Organisation for Social Development and Reconstruction  
Iman Khafaji, Woman Rights Center  
Haidar Al Bahadli, Al Meezan Assembly for Human Rights development  
Hanaa Shammmary, Al Hana Youth Organisation  
Suheil Shammmary, Salah Eddine Assembly of Organisations  
Ahmad Bajallan, Al Taakhy Association for Youth Development  
Saad Battat, Al Khayr Human Organisation  
Haidar Awaadi, Musawaat Organisation for Human Rights  
Walid Faris, Al Hadeeya Organisation for Human Rights  
Majid Abou Al Kilal, Thur Center for Development  
Hasan Rubay'I, Ethaar Institute for Human Development  
Mohammad Shanshal, Scientific Echoes Organisation for Training  
Mohammad Karbooli, Al Nourayn Philanthropic Association  
Hasan Saleh, Iraqi Human Rights Institute  
Abed Al Jabbar Malek, Consumer Protection Association  
Ahmad Nouaymi, Youth Union for Development, Mousil  
Haidar Hasan, Council For Iraqi Individual Development  
Khaled Abboud, Al Safaa humanitarian Organisation  
Imaan Al Kaymi, Toufoulati Humanitarian Organisation  
Sijaad Muhsin, Al Hiyaad Organisation for Media development  
Kathem Al Baydaani, Al Munqith Organisation for Human Rights  
Akram Najeeb, Organisation for Human Rights, KRG  
Abdel Amir AL Nabi, Sayyid Al Shuhadaa Organisation for Social Development  
Buthayna Al Mahdawi Hawaa, Organisation for Aid and development  
Liqaa Obaid, Al Widd Humanitarian Organisation  
Nabil Taha, Development Iraq  
Abbas Kathem Al Aboudi, Al Diyaa Center for Development  
Jassem Al rassol, Nabeh Al Hayat Institute  
Hakim Kathem, Al Ahraar Organisation for Human Rights

Dr. Ali Anbouri, 2020 Assembly  
Dr. Haidar Mousawi, Academics Institute for Sustainability and Transparency  
Hamza Al Jawahiri, Oil Consultancy Organisation  
Abbas Al Ghalabi, Al Mada Newspaper  
Ali Al Ariqwaazi, Al racheed TV  
Zahra Al Bajaari, Al basra Provincial Council  
Amira Al Bakri, Babel Provincial Council  
Dr. Haidar Jabbouri, Babel University  
Ahmad Hadi, Babel Provincial Council  
May Saleh, Babel University  
Huda Zaydan, Al Mada Newspaper

### **Yemen**

Ahmad Zekri, Organisation for Promoting Integrity  
Abdel Qadir Al Banna, Yemeni Observatory for Human Rights  
Tawfiq Batheeji, Human Rights Information and Rehabilitation Center  
Abdel Moez Dabwan, Yemeni parliamentarians Against Corruption  
Youssef Abou Ras, Yemeni Organisation for Economic and Social Development  
Mustapha Nasr, Economic Media Training Center  
Mohammad Mahyoub, Social Democratic Forum  
Abdel Basir Al mashwali, Yemeni Institute for Legal Support  
Marwan Ismail, Organisation for Change Towards Support for Rights and Freedom  
Said Abdel Mo'men, Al Amal Center for Transparency  
Ismail Nooman, Felix for Oil Consultancy  
Adel Shu'aa, Al Mustaqbal party  
Mohammad Nooman, Yemen Center for Human Rights Studies  
Said Al Douwail, Democratic Youth Assembly  
Balqees Al Mussanni, Nidaa Institute for Humanitarian Development  
Nabil Hakami, Irada Institute for Development  
Ansaar Al aasi, Kul Al Banat Institute  
Asaad Omar, Network of Friends of Reconstruction  
Said Bakheel, Organisation for Aid and development, Hadramoot

### **LATIN AMERICA**

#### **Bolivia, Brazil, Chile, Columbia, Ecuador, Mexico, Peru**

Epifanio Baca, Red Latinamericana sobre Industrias Extractivas (RLIE)

#### **Bolivia**

Wilhelm Piérola Iturralde, Uniendo Manos por la Vida (Joining Hands for Life)

#### **Colombia**

Fabio Velásquez, Foro Nacional por Colombia

#### **Ecuador**

Orazio Bellettini, Grupo Faro

**Mexico**

Miguel Pulido, Fundar

**Mexico, Central America and the Caribbean**

Annette von Schoenfeld, Heinrich Böll Foundation

**SOUTH ASIA, SOUTH EAST ASIA & ASIA PACIFIC****Burma**

Tar Yar Mauna, Myanmar Coalition for Transparency and Accountability

**Cambodia**

Kim Natacha/ Mak Bunthoeurn, Cambodians for Resource Revenue Transparency

Nop Vy, Cambodian Center for Independent Media

Cheang Sokha/ Chan Ramy, Youth Resource Development Program

Long Serey, Non-Timber Forest Products

Neb Sinthay, Advocacy and Policy Institute

**India**

Sharmistha Bose, Oxfam India

Nishant Alag, Environics Trust

Ravi Rebbapragada, Mines, Minerals & People (mm&p)

**Indonesia**

Yesi Maryam, Institute for Economic and Social Reform

Maryati Abdullah, Publish What You Pay Indonesia

**Nepal**

Hansha Sanjyal, Global South Initiative

**Papua New Guinea**

Jerry Bagita, Transparency International PNG

**Philippines**

Cielo Magno/ Maria Aurora T.W. Tatada, Bantay Kita

Strauss Fernandez, Alternate Forum for Research in Mindanao

**CC:**

**Commissioner Luis Aguilar**

**Commissioner Daniel Gallagher**

**Commissioner Michael Piwovar**

**Commissioner Kara Stein**