



Standing Committee on Finance  
House of Commons  
Parliament of Canada  
Ottawa, Ontario  
K1A 0A9

August 6<sup>th</sup>, 2014

House of Commons Finance Committee,

Publish What You Pay Canada welcomes the progress the Canadian government has made towards the implementation of its commitment to improve transparency in the extractive sector, both at home and around the world. The Government of Canada, led by Natural Resources Canada, is currently drafting legislation that will require oil, gas and mining companies registered, publicly traded, and/or operating in Canada to publicly disclose payments to all levels of governments, in Canada and abroad, and at both the project and country level. This disclosure is a critical measure in the global fight against corruption and is a necessary step to improve fiscal management and broader governance in resource rich countries. With the passage of legislation in 2015, Canada will join the European Union and the United States in demonstrating international leadership on the issue of transparency in the mining, oil and gas sectors and a broad commitment to improve governance and accountability worldwide.

To fulfill the stated intent of Canada's commitment to payment transparency, it is critical that the payment information disclosed by mining, oil and gas companies be made readily available to the public. This requires that the government establish a centralized repository of all current and previous year reports (for a minimum of ten years) and that company reports use a universal reporting template with open and machine readable data.

Africa Files  
Care Canada  
Canadian Labour Congress  
Canadians for Tax Fairness  
Corporate Knights  
Development and Peace  
Engineers Without Borders Canada  
Oxfam Canada  
Oxfam Quebec  
Partnership Africa Canada  
Plan Canada  
Probe International  
Transparency International Canada  
United Church of Canada  
World Vision Canada

Recommendation:

**Provide Natural Resource Canada with \$200,000.00/annually to create and maintain an archive of company reports. This archive will store company reports for a minimum of ten years and will be searchable by year and company name.**

The current consultation document suggests that the government will post links to reports which would be hosted on individual company websites. Instead, PWYP-Canada recommends that reports be made available in a central database on the Government of Canada's open data website (data.gc.ca) that includes reports over a ten year period, at minimum. Furthermore, PWYP-Canada recommends that information be disclosed using a uniform template, that is open and machine readable and conforms to the Open Data Charter, adopted by Canada and other G8 leader in June of 2013.

Posting links to company reports that are housed on individual company websites is problematic and may reduce the utility of reporting. Firstly, this approach fails to account for the composition of the Canadian extractive sector, which includes many small companies that frequently change names, reformat their website, dissolve, and/or are purchased by larger companies. Secondly, this approach will impede access to data both by creating challenges for civil society organizations that want to aggregate and create interactive data user interfaces. Thirdly, this approach will reduce access to information for stakeholders with limited internet access, by diverting their search to a plethora of different websites. Fourthly, this approach will be time consuming and costly, as staff will need to assess the integrity of links and work with companies to repair damaged links. Lastly, this approach is not compatible with a commitment to create a historical archive of reports. In other jurisdictions implementing mandatory payment reporting standards for mining, oil, and gas companies, such as the United Kingdom, France, the United States, and Norway, reports will be archived and stored in a central database managed by the government to allow investors and other stakeholder to access both current and past reports.

Creating a central database of reports will allow investors and other stakeholders to analyze the data over time and identify historical trends. Posting links that date back over a ten year period or more will inevitably be problematic, as companies will reformat their websites, change names, and/or dissolve (through acquisition or otherwise) links will break. Moreover, the sheer number of links that would need to be maintained over a ten year period will greatly increase the workload for the department managing the webpage where the links will be posted.

Creating a data archive will save countless hours of human resource time, currently unaccounted for, which will otherwise be required to review and repair inactive links. In addition, it will align with the approach adopted by other transparency leaders, such as the United Kingdom, which is also developing a central data repository. Moreover, the creation of a central repository will serve to affirm Canada's

commitment to Open Data Charter and the Open Government Partnership by demonstrating a commitment not only to increased data availability, but also data accessibility.

Publish What You Pay Canada welcomes the governments continued support of mandatory payment transparency in the mining, oil and gas sectors and would welcome the opportunity to provide further comment and clarification on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'C Woodside', written in a cursive style.

Claire Woodside

Director, Publish What You Pay Canada