

LIBERIA EXTRACTIVE INDUSTRIES TRANSPARENCY INITIATIVE (LEITI)

EITI REPORT

Reporting period: 1 January to 31 December 2023

December 2025

This report has been prepared at the request of the Multi-Stakeholder Group (MSG) in charge of the implementation of the Extractive Industries Transparency Initiative in Liberia (LEITI).

The opinion expressed in the report are those of the Independent Administrator and the report has been approved by the LEITI MSG. This report has been prepared exclusively for use by the Liberia Extractive Industries Transparency Initiative (LEITI) and must not be used by other parties, nor for any purposes other than those for which it is intended.

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LIST OF ACRONYMS

ABWA	(Association of) Accountancy Bodies in West Africa
ACEP	Africa Center for Energy Policy
AfDB	African Development Bank
AME	Assistant Minister for Exploration
AML/CFT	Anti-Money Laundering and Countering the Financing of Terrorism
ASM	Artisanal and Small-scale Mining
BAU	Business As Usual
BCRP	Building Climate Resilience Project
BESS	Battery Energy Storage Systems
bn	billion
BO	Beneficial Ownership
BTR	Biennial Transparency Report
BWG	Budget Working Group
CBD	Convention on Biological Diversity
CBL	Central Bank of Liberia
CFMA	Community Forest Management Agreement
CIT	Company Income Tax
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CLSG-RE	Cote D'Ivoire, Liberia, Sierra Leone, & Guinea -Rural Electrification project
CMS	Convention on the Conservation of Migratory Species of Wild Animals
CPI	Corruption Perceptions Index
CSO	Civil Society Organizations
DBDP	Department of Budget & Development Planning
DEM	Department of Economic Management
ECF	Extended Credit Facility
ECOWAS	Economic Community of West African States
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EITI	Extractive Industries Transparency Initiative
EMP	Environmental Management Plan
EPA	Environmental Protection Agency
EPML	Environmental Protection and Management Law
ESG	Environmental and Social Governance
ESIA	Environmental and Social Impact Assessment
ESMAP	Energy Sector Management Assistance Program
ETS	Emissions Trading System

EU	European Union
EUTR	European Union Timber Regulation
FAO	Food and Agriculture Organization
FDA	Forestry Development Authority
FIA	Financial Intelligence Agency
FLEGT-VPA	Forest Law Enforcement, Governance and Trade Voluntary Partnership Agreement
FMC	Forestry Management Contract
FREL	Forest Reference Emission Level
FY	Fiscal Year
GAC	General Auditing Commission
GBV-NAP	Gender-Based Violence National Action Plan
GCC	GNU Compiler Collection
GDP	Gross Domestic Product
GEAPP	Global Energy Alliance for People and Planet
GHG	Greenhouse Gas
GIS	Geographic Information System
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
GoL	Government of Liberia
GRI	Global Reporting Initiative
HPP	Hydro Power Plant
HSE	Health Safety and Environment
HTC	Hydrocarbon Technical Committee
IA	Independent Administrator
IFAC	International Federation of Accountants
IFAD	International Fund on for Agricultural Development
IFC	International Finance Corporation
IMCC	Inter-Ministerial Concession Committee
IMF	International Monetary Fund
IPP	Independent Power Producer
ISRS	International Standards on Related Services
ISSAI	International Standards of Supreme Audit Institutions
ITAS	Integrated Tax Administration System
ITMO	Internationally Transferrable Mitigation Outcomes
ITTO	International Tropical Timber Organization
IUCN	International Union for Conservation of Nature
LACC	Liberia Anti-Corruption Commission
LACRA	Liberia Agriculture Commodity Regulatory Authority
LAS	Legality Assurance System
LBR	Liberia Business Registry

LEC	Liberia Electricity Corporation
LEEAP	Liberia Energy, Efficiency and Access Project
LEITI	Liberia Extractive Industries Transparency Initiative
LERC	Liberia Energy Regulatory Commission
LESSAP	Liberia Electricity Sector Strengthening and Access Project
LGS	Liberian Geological Survey
LICPA	Liberian Institute of Certified Public Accountants
LIRENAP	Liberia Renewable Energy Access Project
LISGIS	Liberia Institute of Statistics and Geo-Information Services
LPRA	Liberia Petroleum Regulatory Authority
LRA	Liberia Revenue Authority
LRC	Liberia Revenue Code
MCAS	Mining Cadastre Administration System
MCHPP	Mt. Coffee Hydropower Plant
MCIMU	Mining Cadastre Information Management Unit
MDA	Mineral Development Agreement
MFDP	Ministry of Finance and Development Planning
MME	Ministry of Mines and Energy
MoA	Ministry of Agriculture
MoL	Ministry of Labor
MRV	Measurement, Reporting and Verification
MSG	Multi-stakeholder Group
MTEF	Medium Term Expenditure Framework
NBC	National Bureau of Concessions
NCA	Natural Capital Accounting
NDC	Nationally Determined Contributions
NEP	National Environmental Policy
NOCAL	National Oil Company of Liberia
NPA	National Port Authority
OECD	Organization for Economic Co-operation and Development
OEP	Opening Extractive Program
OTP	Order To Pay
PA	Paris Agreement
PAFA	Pan African Federation of Accountants
PAPD	Pro-Poor Agenda for Prosperity and Development
PEP	Politically Exposed Persons
PEPA	Petroleum Exploration and Production Act
PETS	Public Expenditure Tracking
PFM	Public Finance Management

PHRD	Policy and Human Resources Development Fund
PPA	Power Purchase Agreements
PPCA	Public Procurement and Concessions Act
PPCC	Public Procurement and Concessions Commission
PPE	Personal Protective Equipment
PSC	Production Sharing Contract
PV	Photovoltaics
QFE	Quasi-Fiscal Expenditure
REDD	Reducing Emissions from Deforestation and forest Degradation
REFUND	Rural Energy Fund
RESPITE	Regional Emergency Solar Project Intervention
ROR	Rate of Return
RREA	Rural and Renewable Energy Agency
RT	Reporting Template
SASB	Sustainability Accounting Standards Board
SEEA	System of Environmental-Economic Accounting
SGBV	Sexual and Gender Based Violence
SIGTAS	Standard Integrated Government Tax System
SOE	State-Owned Enterprise
SSA	Sub-Saharan Africa
T&D	Transmission and Distribution
TCEP	Tree Crops Extension Project
TSC	Timber Sales Contract
TSOe	Transport Service Operator of Electricity
TTG	Tonalite-trondhjemite-granodiorite
UAC	Unit of Account
UAE	United Arab Emirates
UK	United Kingdom
UL	University of Liberia
UN	United Nations
UNEP	United Nations Environment Program
UNFCCC	United Nations Framework Convention on Climate Change
US\$	United States dollar
USA	United States of America
USAID	United States Agency for International Development
VCS	Verified Carbon Standard
WATM	West Africa Transform Margin
WGI	Worldwide Governance Indicators
WMT	Wet Metric Tons

1. INTRODUCTION

Extractive Industries Transparency Initiative (EITI)

Background

The Extractive Industries Transparency Initiative ([EITI](#)) is a global Standard to promote open and accountable management of natural resources. It seeks to strengthen government and company systems, inform public debates, and enhance trust. In each implementing country, it is supported by a coalition of governments, companies operating in the extractive sector and civil society organizations working together. It was first announced at the World Summit on Sustainable Development in Johannesburg in 2002 (the Earth Summit 2002) and was officially launched in London in 2003.

Evolving normative framework (2003-2023)

EITI reports should be prepared based on the 2023 EITI Standard (here in after referred to as the “[EITI Standard](#)”). This is the fourth version of the Standard since the EITI Principles were declared in 2003.

To enable countries to respond to the most pressing challenges facing natural resource governance, the 2023 EITI Standard includes several new and refined provisions. EITI Implementing Countries will not be assessed against the 2023 Standard until 2025, but are encouraged to incorporate the new requirements earlier.

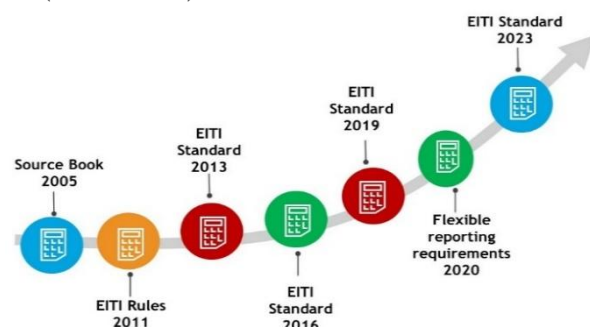
These broadly cover four thematic areas:

- **Anti-corruption:** Enhance the ability of countries and companies to use the EITI platform for the identification and management of corruption risks in the natural resource sector.
- **Energy transition:** Supporting disclosure and public debate on the implications of energy transition by highlighting relevant policies, as well as revenues countries can expect from their oil, gas and minerals under different market scenarios.

- **Gender, social and environmental issues:** To help ensure that natural resources are managed in the interests of all citizens, there are stronger provisions to promote greater diversity in decision-making and disclosure, considering gender, social and environmental issues.
- **Revenue collection:** New and refined provisions require more comprehensive and detailed disclosures, which can help countries strengthen their tax base and raise revenues.

For further information about the 2023 EITI Standard, please refer to the [summary of changes](#) the EITI International Secretariat prepared in June 2023.

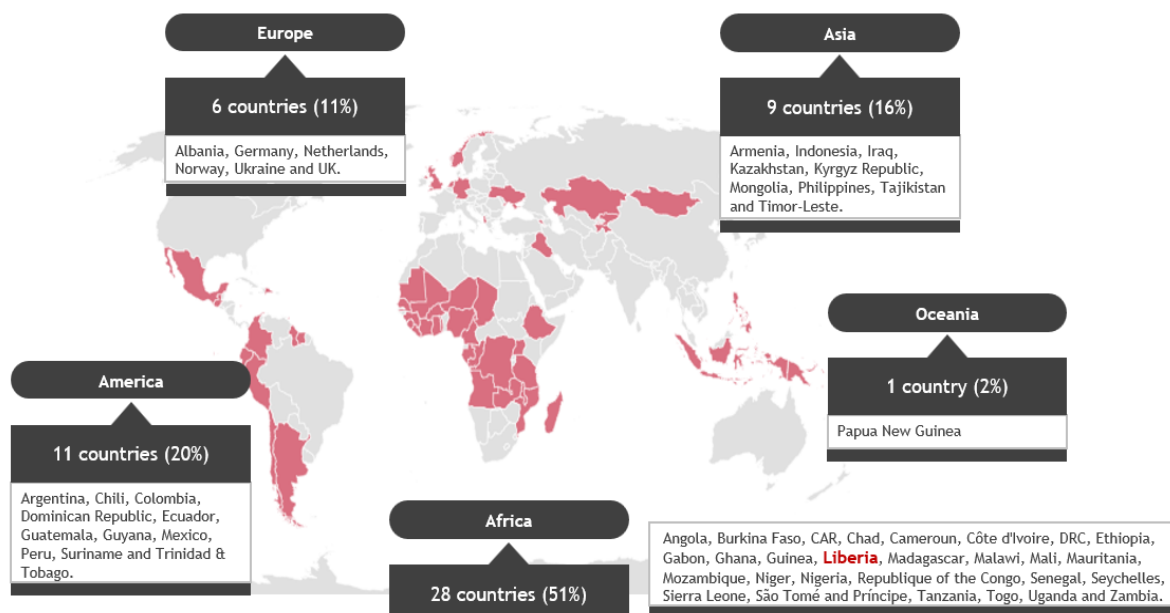
FIGURE 1: EVOLVING NORMATIVE FRAMEWORK (2003-2023)



EITI Implementing countries

EITI is currently being implemented in 55 countries in Africa, Asia, Europe, the Americas and Oceania. Please see Figure 2 below.

FIGURE 2: MAP OF EITI IMPLEMENTING COUNTRIES



Independent evaluation of EITI

The EITI International Secretariat published in November 2022 an [independent evaluation of EITI](#). It builds efforts to strengthen EITI's approach to documenting, communicating and learning from the results of implementation, in line with recommendations from a 2020 review of international best practice in results measurement and impact evaluation.

The study raised some findings in the following areas:

- Informing the energy transition
- Supporting open data
- informing investment decisions
- Strengthening revenue mobilization
- Addressing corruption risks
- Measuring impact

EITI in Liberia

Liberia formally joined the Extractive Industries Transparency Initiative (EITI) in April 2007. To give effect to its commitments, the Liberia Extractive Industries Transparency Initiative (LEITI) was established as an autonomous agency through an Act of the Liberian Legislature, approved on 10 July 2009¹. In the same year, Liberia became the first African country to

¹ [Liberia Extractive Industries Transparency Initiative \(LEITI\) Act, 2009](#)

achieve EITI compliant status. The LEITI is overseen by a Multi-Stakeholder Group (MSG), which serves as its governing body and includes representatives from the Government of Liberia (GoL), civil society organizations (CSOs), the private sector, and Liberia's development partners.

The LEITI process covers the mining and oil & gas sectors as well as the agriculture and forestry sectors. To date fifteen (15) annual EITI Reports have been published covering the period from 1 July 2007 until 31 December 2022.

The timeline for LEITI process can be presented as follows:

TABLE 1: LEITI KEY MILESTONES

Date	Event
2007	Liberia MSG formed.
2007	Liberia's government announces Commitment to EITI.
2008	Liberia becomes a candidate country.
January 2009	Liberia 1 st EITI Report published. (Period covered: July 2007 - June 2008)
July 2009	Liberia published the LEITI Act
2009	Liberia Wins EITI Chair's award at Doha Global Conference.
2009	Liberia Validation Report submitted
2009	LEITI Act requires disclosure of contracts and payments from stakeholders.
October 2009	Liberia designated Compliant country.
January 2010	Liberia 2 nd EITI Report published. (Period covered: July 2008 - June 2009)
November 2011	Liberia 3 rd EITI Report published. (Period covered: July 2009 - June 2010)
May 2013	Liberia 4 th EITI Report published. (Period covered: July 2010 - June 2011)
2013	Post Award Process Audit reveals that procedures for awarding contracts are not being followed.
June 2014	Liberia 5 th EITI Report published. (Period covered: July 2011 - June 2012)
December 2015	Liberia 6 th EITI Report published. (Period covered: July 2012 - June 2013)
30 June 2016	Liberia 7 th EITI Report published. (Period covered: July 2013 - June 2014)
1 July 2016	Commencement of Validation.
July 2016	Liberia 8 th EITI Report published. (Period covered: July 2014 - June 2015)
January 2019	Liberia 9 th EITI Report published. (Period covered: July 2015 - June 2016)
December 2019	Liberia 10 th and 11 th EITI Report published. (Period covered: July 2016 - June 2018)
April 2021	Liberia 12 th EITI Report published. (Period covered: July 2018 - June 2019)
May 2022	Scoping Report on Beneficial Ownership Transparency in Liberia published
June 2022	Liberia 13 th EITI Report published. (Period covered: July 2019 - June 2020)
December 2022	Liberia 14 th EITI Report published. (Period covered: July 2020 - June 2021)
January 2024	Liberia 15 th EITI Report published. (Period covered: July 2021 - December 2022)

EITI Validation

In June 2022, the EITI Board concluded that Liberia had achieved a moderate overall score (75.5 out of 100 points) in EITI implementation. The assessment highlighted strong performance in outcomes and impact, while noting weaknesses in transparency and

stakeholder engagement. Despite challenges posed by the COVID-19 pandemic, Liberia maintained its multi-stakeholder process and outreach activities across all fifteen counties.

The validation exercise identified fourteen corrective actions and sixteen strategic recommendations to address gaps related to licensing, contract disclosure, beneficial ownership, and the governance of state-owned enterprises.

The next validation will commence in January 2026 in accordance with the [EITI validation schedule](#).

Objective of the report

The purpose of this 16th LEITI report is to compile and present the data provided by the extractive companies (hereinafter referred to as “companies”) in comparison with the relevant data provided by government agencies for effective governance of the extractive sector.

The overall objective of this exercise is to assist the GoL in understanding the contributions of all extractive resources, including minerals, oil and gas, forestry, and agriculture, to the country’s economic and social development, and to enhance their potential through strengthened resource governance that fully adheres to the principles and requirements of the EITI.

Scope of Work

HLB Liberia LLC and BDO LLP were appointed as Independent Administrator to prepare the 16th LEITI Report for the period from 1 January to 31 December 2023.

This engagement was carried out in accordance with the International Standards on Related Services (ISRS 4400 Engagements to perform agreed upon procedures regarding Financial Information). The procedures performed were those set out in the terms of reference (ToR) included in the contract for consultants’ services.

The reconciliation procedures carried out were not designed to constitute an audit or a review in accordance with International Standards on Auditing or International Standards on Review Engagements and as a result, no assurances on the transactions beyond the explicit statements set out in this report are being expressed.

Reported data disaggregated by extractive entities, government agencies and revenue streams, are presented in Sections 6 and 7 of this report.

This report incorporates information received up to 2 December 2025. Information received after this date has not, therefore, been included in this report.

2. EXECUTIVE SUMMARY

This report covers payments made by extractive entities and revenues received by government agencies and other material payments and benefits to government agencies as stated by Requirement 4.1 of the 2023 EITI Standard.

It also includes contextual information about the extractive industries in accordance with EITI Requirements 2, 3, 4, 5 and 6. This information includes a summary description of the legal framework and fiscal regime, an overview of the extractive sector, the extractive industries' contribution to the economy, production and exports data, the State's shareholding in extractive entities, revenue allocations, license registers and license allocations.

2.1. Revenue Generated from the Extractive Industries

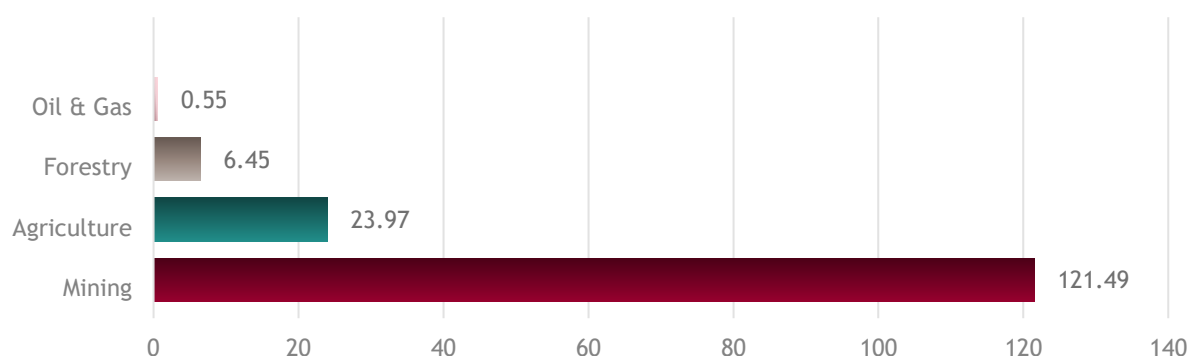
Total revenues received from the extractive sector amounted to US\$ 152 million during the financial year (FY) 2023. Revenues collected by the Liberia Revenue Authority (LRA) accounted for 80% of the total revenue streams generated by the sector. The breakdown of revenues is set out in the table below:

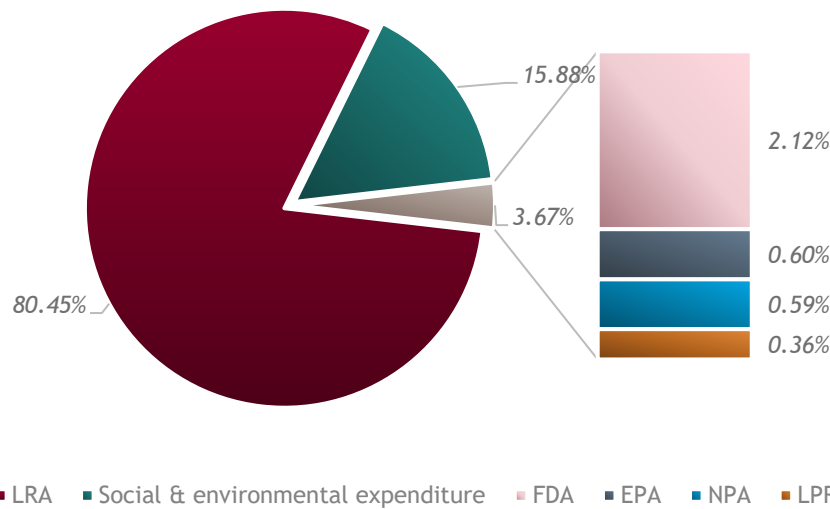
TABLE 2: TOTAL EXTRACTIVE REVENUES BY GOVERNMENT AGENCY AND BY SECTOR

Amounts in US\$ million	Mining	Agriculture	Forestry	Oil & Gas	Total revenues	% of total revenues
Liberia Revenue Authority (LRA)	107.97	11.87	2.81	-	122.65	80.45%
<i>Retained in reconciliation scope</i>	<i>84.85</i>	<i>10.68</i>	<i>2.37</i>	<i>-</i>	<i>97.90</i>	<i>64.21%</i>
<i>Unilateral disclosure</i>	<i>5.63</i>	<i>1.19</i>	<i>0.44</i>	<i>-</i>	<i>7.25</i>	<i>4.76%</i>
<i>Revenue from unidentified taxes</i>	<i>17.50</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>17.50</i>	<i>11.48%</i>
Social and environmental expenditure	12.41	11.58	0.22	-	24.21	15.88%
<i>Social expenditure</i>	<i>11.56</i>	<i>11.37</i>	<i>0.20</i>	<i>-</i>	<i>23.13</i>	<i>15.17%</i>
<i>Environmental expenditure</i>	<i>0.84</i>	<i>0.21</i>	<i>0.03</i>	<i>-</i>	<i>1.08</i>	<i>0.71%</i>
Forestry Development Authority (FDA)	-	-	3.23	-	3.23	2.12%
Environmental Protection Agency (EPA)	0.82	0.02	0.07	-	0.91	0.60%
National Port Authority (NPA)	0.29	0.50	0.12	-	0.90	0.59%
Liberia Petroleum Regulatory Authority (LPRA)	-	-	-	0.55	0.55	0.36%
Total	121.49	23.97	6.45	0.55	152.46	100.00%

Source: LEITI Reporting templates

FIGURE 3 : STRUCTURE OF REVENUES FROM THE EXTRACTIVE SECTOR



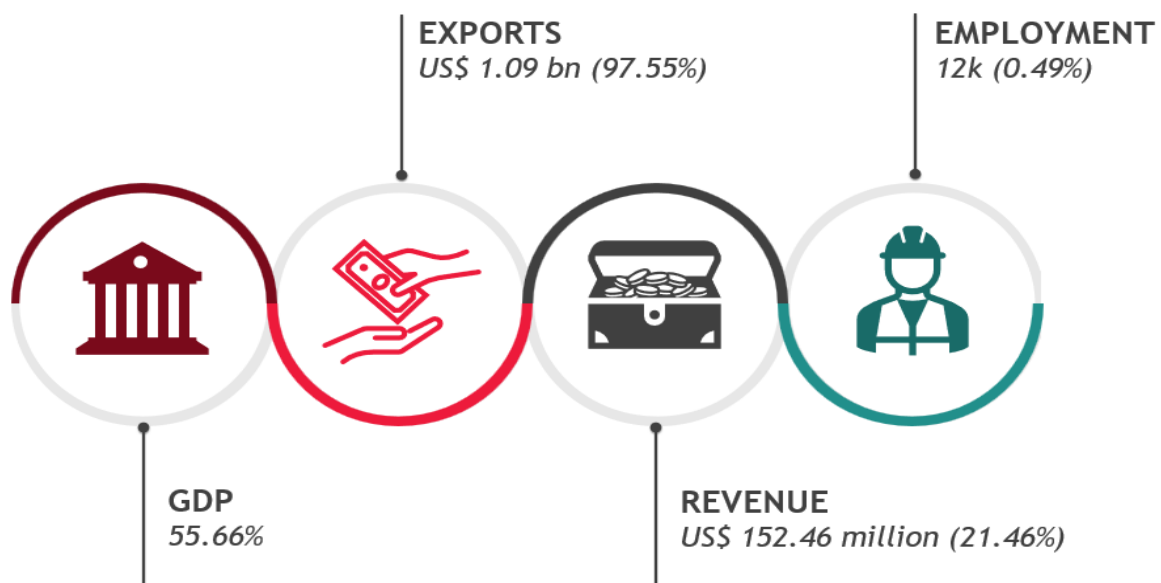


The Detail of total extractive revenues during the FY 2023 is presented in Section 7 of this report.

2.2. Contribution to Liberia's Economy

The contribution of the extractive sector can be summarized as follows:

FIGURE 4 : CONTRIBUTION OF THE EXTRACTIVE SECTOR TO THE ECONOMY



The value of exports from the mining, forestry and agriculture sectors amounted to US\$ 1,087 million accounting for 97.55% of the total exports of the country during the FY 2023 according to data provided by the Central Bank of Liberia (CBL).

According to the Central Bank of Liberia (CBL), the Gross Domestic Product (GDP) from mining, forestry and agriculture sector sectors amounted to US\$ 1,978 million and accounted for 55.66% of total GDP in 2023.

The contribution of the extractive sector to Government's revenue amounted to US\$ 152.46 million, accounting for 21.46% of the total domestic revenues for 2023.

According to data collected from the Ministry of Labor (MoL), there were 12,333 people employed in the mining, agriculture and forestry sectors in 2023, representing 0.49% of the country's labor force, 19% of them are female workers.

The details of the contribution to the economy are presented in Section 4.15 of this report.

2.3. Production and Export Data

Production

The table below presents the summary of production quantities for the mining, agriculture and forestry sectors during the FY 2023 by commodity:

TABLE 3: PRODUCTION DATA (QUANTITIES)

Sector/Commodity	Unit	Volume
Mining sector (1)		
Iron Ore	MT	4,002,474
Diamond	Carat	56,838
Gold	Kg	12,379
Agriculture sector (2)		
Rubber	Ton	77,055
Crude Palm Oil	MT	85,271
Kernel Palm	MT	11,435
Palm	Ton	6,586
Palm Kernel Cake	MT	2,711
Kernel Palm Oil	MT	1,625
Fresh Fruit Bunches	MT	36,125
Forestry sector (3)		
Round Logs	m ³	3,391

Source: LEITI Reporting templates

(1) According to the data collected from the Ministry of Mines and Energy (MME).

(2) According to the data collected from the agricultural companies included in the reconciliation scope. Production data for the agriculture sector was not provided by the Ministry of Agriculture (MoA).

(3) According to the data collected from the Forestry Development Authority (FDA).

We contacted the MME (for the mining sector), the FDA (for the forestry sector) and the MoA (for the agriculture sector) and invited them to provide us with the production and exports data in terms of volume and value. However, no information on the value of production has been communicated by the FDA nor the extractive companies included in the reporting scope.

Details of production volumes are detailed by sector and by extractive company in section 4.12 of this report.

Exports

The table and figures below provide an overview of exports data from the mining, agricultural and forestry sectors as well as the contribution by sector and by commodity to Liberia's exports during the FY 2023:

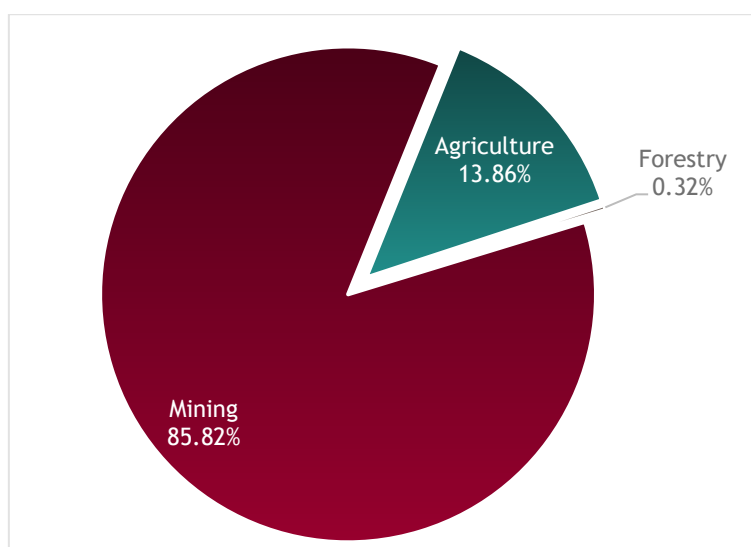
TABLE 4: EXPORT DATA

Sector/Commodity	Unit	Volume	Value (US\$ million)	%
Mining sector (1)			1,160.95	85.82%
Gold	Kg	12,379	660.34	48.82%
Iron ore (2)	Mt	4,002,474	482.70	35.68%
Diamond	Carat	56,838	17.91	1.32%
Agriculture sector (2)			187.46	13.86%
Rubber	Ton	76,782	103.00	7.61%
Crude palm oil	Mt	94,680	82.79	6.12%
Kernel palm oil	Mt	1,544	1.47	0.11%
Kernel palm	Mt	1,416	0.21	0.02%
Forestry sector (3)			4.32	0.32%
Round logs	m3	98,426	4.32	0.32%
Total Export			1,352.74	100.00%

Source: LEITI Reporting templates

- (1) According to the data collected from the Ministry of Mines and Energy (MME).
 (2) According to the data collected from the agricultural companies included in the reconciliation scope. Export data for the agriculture sector was not provided by the Ministry of Agriculture (MoA).
 (3) According to the data collected from the Forestry Development Authority (FDA).

FIGURE 5: EXPORT CONTRIBUTION BY SECTOR



2.4. Scope of the Data Collection and Reconciliation

Reconciliation scope

The LEITI MSG agreed to include the mining, agricultural and forestry sectors in the reconciliation scope.

Based on the revenue structures collected by the LRA, the LEITI MSG agreed to include four (4) mining companies, five (5) agricultural companies and seven (7) forestry companies, which held active licenses during the FY 2023 and which made payments over the materiality threshold of US\$ 1,000,000 for the mining sector, US\$ 500,000 for the agricultural sector and US\$ 100,000 for the forestry sector.

TABLE 5: LIST OF EXTRACTIVE ENTITIES RETAINED IN THE RECONCILIATION SCOPE

N°	Company name	Mining	Agriculture	Forestry
1	Arcelor Mittal (Liberia) Ltd	✓		
2	Bea Mountain Mining, Inc.	✓		
3	China-Union Investment (Liberia) Bong Mines Co. Ltd	✓		
4	Western Cluster Limited	✓		
5	Cavalla Rubber Corporation		✓	
6	Firestone Liberia, LLC		✓	
7	Golden Veroleum Liberia Inc.		✓	
8	Liberian Agricultural Company		✓	
9	Libinc Oil Palm, Inc		✓	
10	Euro-Liberia Logging Company			✓
11	Geblo Logging, Inc			✓
12	Horizon Logging Limited			✓
13	Kisvan Timber Corporation			✓
14	Liberia Tree And Trading Company, Inc			✓
15	West African Forest Development Incorporated (WAFDI)			✓
16	West Water Group (Liberia), Inc.			✓

The revenues included in the reconciliation scope for FY 2023 represent 64% of the total adjusted revenues from the mining, agriculture and forestry sectors as detailed below:

TABLE 6: RECONCILED REVENUES FOR THE FY 2023

Payments from	Revenues		Breakdown by sector			
	(US\$ million)	%	Mining	Agriculture	Forestry	Oil & Gas
	(a)+(b)+(c)		(a)	(b)	(c)	(d)
Total reconciled revenues(*) (1)	97.90	64%	84.85	10.68	2.37	0.55
Unilateral disclosure by Government Agencies (**)	12.29	8%	6.73	1.71	3.86	0.55
Unilateral disclosure by companies (**)	24.76	16%	12.41	11.58	0.23	-
Total unilateral disclosure (2)	37.06	24%	19.14	13.29	4.08	0.55
Revenue from unidentified taxes (3)	17.50	11%	17.50	-	-	-
Total revenues (1) + (2) + (3)	152.46	100%	121.49	23.97	6.45	0.55

(*) Reconciled revenues detailed by extractive entity in Section 6 of this report.

(**) Unilateral disclosure by Government Agencies and by companies are detailed by company in Section 7.2 of this report.

The LEITI MSG agreed to include in the reconciliation scope the LRA which is a centralised government revenues collection agency responsible for collecting taxes from extractive entities.

Unilateral disclosure for the Mining Sector

As agreed by LEITI MSG, revenues below the materiality threshold collected from mining entities were included in the EITI Scope through unilateral disclosure by government agencies in accordance with EITI Requirement 4.1.d.

Mining entities within the reconciliation scope have also been requested to disclose unilaterally all social and environmental expenditure as well as the subnational payments they made.

Based on the above, we have included a combined amount of US\$ 36.64 million as unilateral disclosures by Government Agencies and by mining companies in the report. These unilateral disclosures represent 30% of total mining sector revenues, which therefore means that 70% of total revenue of the mining sector was included in the reconciliation scope.

TABLE 7: UNILATERAL DISCLOSURE FOR THE MINING SECTOR

Payments from	Revenues	
	(US\$ million)	%
Mining sector total revenue	121.49	100%
Reconciled revenue from the mining sector	84.85	70%
Unilateral disclosure by government agencies	6.73	6%
Unilateral disclosure by mining entities within the reconciliation scope (*)	12.41	10%
Revenue from unidentified taxes	17.5	14%
Total unilateral disclosure of mining sector revenues	36.64	30%

Source: LEITI Reporting Templates

(*) This corresponds to Social and environmental Contribution (SC) reported by the mining entities within the reconciliation scope.

The details of the unilateral disclosure are presented in Section 7.3 of this report.

Unilateral disclosure for the Oil & Gas Sector

As agreed by LEITI MSG, revenues below the materiality threshold collected from mining entities were included in the EITI Scope through unilateral disclosure by government agencies in accordance with EITI Requirement 4.1.d.

Based on the above, we have included a combined amount of US\$ 0.55 million as unilateral disclosures by Government Agencies in the report, which consists of license fees. These unilateral disclosures represent 100% of total oil & gas sector revenues and are detailed as follows:

TABLE 8: OIL & GAS LICENSE FEES COLLECTED BY THE LPRA DURING FY 2023

Project (MDA/ Concession / License)	Receipt number	Payment Date	Comments	Amount USD
Prequalification	Transfer	28/01/2023	License fee for Prequalification of Canadian Global Energy (CGE)	50,000
Prequalification	Transfer	22/03/2023	License fee for Prequalification of ExxonMOBIL	50,000
Offshore Hydrocarbon Reconnaissance License	WW23092260276088	22/09/2023	Offshore Hydrocarbon Reconnaissance License fee for Block LB-26	150,000
Offshore Hydrocarbon Reconnaissance License	WW23092260276092	22/09/2023	Offshore Hydrocarbon Reconnaissance License fee for Block LB-30	150,000
Offshore Hydrocarbon Reconnaissance License	WW23092260276147	22/09/2023	Offshore Hydrocarbon Reconnaissance License fee for Block LB-31	150,000
Total				550,000

Source: LPRA

The details of the unilateral disclosure are presented in Section 7.3 of this report.

Unilateral disclosure for the Agriculture Sector

We included a combined amount of US\$ 13.29 million as unilateral disclosures by government agencies and agricultural companies in the report. These unilateral disclosures represent 55% of total revenues of the agriculture sector, which therefore means that 45% of the total agriculture sector revenue was included in the reconciliation scope.

TABLE 9: UNILATERAL DISCLOSURE FOR THE AGRICULTURE SECTOR

Payments from	Revenues	
	(US\$ million)	%
Agriculture sector total revenue	23.97	100%
Reconciled revenue from the agriculture sector	10.68	45%
Unilateral disclosure by Government Agencies	1.71	7%
Unilateral disclosure by agricultural entities within the reconciliation scope (*)	11.58	48%
Total unilateral disclosure of agriculture sector revenues	13.29	55%

Source: LEITI Reporting Templates

(*) This corresponds to Social and environmental Contribution (SC) reported by the agricultural entities within the reconciliation scope.

Details of the unilateral disclosure are presented in Section 7.3 of this report.

Unilateral disclosure for the Forestry Sector

As agreed by LEITI MSG, revenues collected from forestry entities below the materiality threshold were included in the EITI Scope through unilateral disclosure by Government Agencies in accordance with EITI Requirement 4.1.d.

Based on the above, we have included a combined amount of US\$ 4.08 million as unilateral disclosures by Government Agencies and by forestry companies in the report. These

unilateral disclosures represent 63% of total forestry sector revenues, which therefore means that 37% of total revenue of the forestry sector was included in the reconciliation scope.

TABLE 10: UNILATERAL DISCLOSURE FOR THE FORESTRY SECTOR

Payments from	Revenues	
	(US\$ million)	%
Forestry sector total revenues	6.45	100%
Reconciled revenues from the forestry sector	2.37	37%
Unilateral disclosure by government agencies	3.86	60%
Unilateral disclosure by forestry entities within the reconciliation scope (*)	0.23	3%
Total unilateral disclosure of forestry sector revenues	4.08	63%

Source: LEITI Reporting Templates

(*) This corresponds to Social and environmental Contribution (SC) reported by the agricultural entities within the reconciliation scope.

The details of the unilateral disclosure are presented in Section 7.3 of this report.

2.5. Completeness and Reliability of Data

Comprehensiveness

Government Agencies

The LEITI MSG agreed that eight (8) government agencies would be required to disclose the revenues received from extractive companies, contextual data related to the exploration, production, exports, state participation, infrastructure provisions and barter agreements, environmental and social expenditure, and employment as required by the EITI Standard.

The government agencies selected in the scope are presented in the table below:

TABLE 11: LIST OF GOVERNMENT AGENCIES WITHIN THE LEITI REPORTING PROCESS

N°	Government agency	Status
1	Liberia Revenue Authority (LRA)	Included in the reconciliation scope
2	Environmental Protection Agency (EPA)	Unilateral disclosure
3	National Port Authority (NPA)	
4	Ministry of Mines and Energy (MME)	
5	Ministry of Agriculture (MoA)	
6	Forestry Development Authority (FDA)	
7	National Oil Company of Liberia (NOCAL)	
8	Liberia Petroleum Regulatory Authority (LPRA)	

All government agencies included in the reporting scope of the LEITI 16th report through unilateral disclosure or included in the reconciliation scope, have submitted their reporting templates, except for the Ministry of Labor (MoL).

Based on the above, we can reasonably conclude that both financial and non-financial data included in the LEITI report for FY 2023 are comprehensive.

Extractive entities

Fourteen (14) out of 16 extractive companies included in the reconciliation scope submitted their reporting templates. Receipts reported by government agencies and relating to these extractive entities amounted to US\$ 97.41 million accounting for 99.69% of the reconciled revenues.

Two (2) extractive companies did not submit their reporting templates. Receipts reported by government agencies and relating to these companies amounted to US\$ 0.31 million accounting for 0.31% of the reconciled revenues, details of which can be found in the table below:

TABLE 12: GOVERNMENT REVENUES RELATED TO RTs NOT SUBMITTED BY EXTRACTIVE COMPANIES

N°	Company	Amount (US\$ million)	Weight (%)
1	Horizon Logging Limited	0.20	0.20%
2	West African Forestry Development Inc. (WAFDI)	0.11	0.11%
Total of reporting templates not submitted by extractive entities		0.31	0.31%
Total reconciled revenues		97.90	100.00%

We were informed by the FDA during the reconciliation exercise that the 2 companies above were inactive during FY 2023.

Similarly, the company “Geblo Logging, Inc” informed us that their harvesting certificate was denied by the FDA during 2023. Due to the financial difficulties faced, the company shut down its operations in 2023 and resumed activity in 2024.

The status of reporting templates submitted by extractive entities is presented in Annex 9 of this report.

Based on the above, we can reasonably conclude that this report covers all significant revenues made by extractive entities to the revenues of Liberia during the FY 2023.

Data Reliability

Government agencies

The LEITI MSG agreed to include in the reconciliation scope the LRA which is a centralised government revenues collection agency responsible for collecting taxes from extractive entities.

Receipts reported by the LRA amounted to US\$ 105.15 million, representing 95.42% of the total extractive revenues reported by the different government agencies included in the reporting process, and 69.49% of the total revenues from mining, agriculture and forestry sectors for the FY 2023.

To ensure that EITI data submitted by the LRA is subject to credible, independent audits, applying international auditing standards, the LEITI MSG agreed on the reporting templates (RTs) for the LRA to be:

- co-signed by an authorized senior manager and the finance/tax officer; and
- certified by the General Auditing Commission (GAC) who should submit a report confirming that the figures and information disclosed by the LRA are in accordance with

instructions issued by LEITI MSG, are comprehensive and agree with the government accounts for the FY 2023.

However, the reporting templates that were submitted by the LRA were not certified by the GAC, as agreed by the LEITI MSG. The MSG confirmed that the verification report established by the GAC will be published separately on the LEITI website.

Extractive companies

To ensure that EITI data submitted by extractive companies included in the reconciliation scope are subject to credible, independent audits, applying international standards on auditing, the LEITI MSG agreed on the Reporting Templates (RTs) for the extractive companies to be:

- co-signed by an authorized senior manager and the finance/tax officer;
- certified by an external auditor or a statutory auditor who should confirm that the figures and information included in the RT are in accordance with the instructions issued by LEITI MSG, comprehensive and agree with the company's accounts for the FY 2023; and
- accompanied by the company's audited financial statements for the FY 2023 to compare the information reported in their RTs against those of the audited financial statements.

Ten (10) have submitted their RTs signed by an authorized officer at management level, while the other four (04) companies submitted unsigned RTs, in addition to “**Horizon Logging Limited**” and “**WAFDI**” that did not submit their RTs. The revenues reported in respect of companies which submitted reporting templates not signed by management amounted to US\$ 45.96 million, representing 46.90% of the total reconciled revenues. These are set out as follows:

TABLE 13: GOVERNMENT REVENUES RELATED TO UNSIGNED REPORTING TEMPLATES

N°	Company	Amount (US\$ million)	% by companies
1	Bea Mountain Mining, Inc.	33.47	34.19%
2	China-Union Investment (Liberia) Bong Mines Co. Ltd	5.55	5.67%
3	Western Cluster Limited	6.09	6.23%
4	Euro-Liberia Logging Company	0.85	0.87%
Total of unsigned reporting templates		45.96	46.90%
Total reconciled revenues		97.99	100.00%

Only eight (8) extractive companies submitted their audited financial statements that are as follows :

- Arcelor Mittal Liberia Ltd
- Bea Mountain Mining, Inc.
- Western Cluster Limited
- Cavalla Rubber Corporation
- Firestone Liberia, LLC
- Liberian Agricultural Company
- Libinc Oil Palm, Inc
- Euro-Liberia Logging Company

Only seven (07) companies submitted RTs that were certified by an external auditor.

Seven (07) extractive companies submitted RTs that were not certified by an external auditor, in addition to “**Horizon Logging Limited**” and “**WAFDI**” that did not submit their RTs. The revenues reported by government agencies in respect of the latter seven (07) companies amounted to US\$ 49.12 million representing 50.13% of the total reconciled revenues, details of which can be found in the table below:

TABLE 14: GOVERNMENT REVENUES RELATED TO UNCERTIFIED REPORTING TEMPLATES

N°	Company	Amount (US\$ million)	% by companies
1	Arcelor Mittal (Liberia) Ltd	39.73	40.59%
2	China-Union Investment (Liberia) Bong Mines Co. Ltd	5.55	5.67%
3	Golden Veroleum Liberia Inc.	1.96	2.00%
4	Euro-Liberia Logging Company	0.85	0.87%
5	Geblo Logging, Inc	0.38	0.39%
6	Liberia Tree and Trading Company, Inc	0.20	0.20%
7	West Water Group (Liberia) Inc.	0.45	0.46%
Total of unsigned reporting templates		49.12	50.13%
Total reconciled revenues		97.99	100.00%

The status of RTs submitted by extractive entities is presented in Annex 9 to this report.

Assessment of assurance level of data

Based on the above, it was not possible to conclude that the financial data submitted by government agencies and extractives companies included in this report was based on data subject to audits that were performed in accordance with international standards.

2.6. Reconciliation of Cash Flows

The purpose of reconciling payment flows was to identify any potential discrepancies in the declarations and to clarify them. The discrepancies initially identified were analyzed and adjusted whenever the relevant supporting documents were made available by the reporting parties.

Based on the data collected from extractive entities and Government Agencies, revenues generated from the extractive industries amounted to US\$ 152.46 million. The revenues included in the reconciliation scope amounted to US\$ 97.90 million and represent 64% of the total extractive revenues during FY 2023. The remaining 36% of the extractive revenues amounting to US\$ 54.56 million were unilaterally disclosed by the extractive companies and government agencies.

Following the adjustments resulting from the reconciliation exercise, a net difference of US\$ 1.58 million remained unreconciled, which represents 1.61% of government revenues of US\$ 97.90 million included in the reconciliation scope, as set out in the table below.

TABLE 15: CASH FLOWS RECONCILIATION FOR THE FY 2023

Government agency	Extractive Companies (US\$ million) (a)	Govt (US\$ million) (b)	Unreconciled Difference (c) = (a) - (b)	% (d) = (c)/(b)
Liberia Revenue Authority (LRA)	99.48	97.90	1.58	1.61%
Reconciled government revenues	99.48	97.90	1.58	1.61%

Source: LEITI Reporting Templates

The details of the reconciliation results and adjustments made by company and by tax are set out in Section 6 of this report. The detailed reconciliation sheets by extractive entity are set out in Annex 8 to this report.

2.7. Recommendations

Relevant recommendations and additional measures to be implemented to improve the EITI process in Liberia are summarized as follows:

TABLE 16: SUMMARY OF THE EITI RECOMMENDATIONS

N°	Recommendations
1	Data quality and assurance (EITI Requirements 4.1 and 4.9)
2	Disaggregation and classification of the extractive sector revenues (EITI Requirement 4.1)
3	Public disclosure of the full text of the mining licenses (EITI Requirement 2.4.e)
4	Improving the accuracy of production and export data (EITI Requirements 3.2 and 3.3)
5	Strengthening Beneficial Ownership disclosure (EITI Requirement 2.5)
6	Public disclosure and transparency of the SOEs (EITI Requirement 2.6.b)
7	Mainstreaming and systematic disclosure of EITI data (EITI Requirement 7.2)
8	Updating data on the contribution of the informal mining sector (EITI Requirement 6.3)



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08 December 2025

3. APPROACH AND METHODOLOGY

The EITI reconciliation process included the following steps:

- conducting a scoping study to determine the scope of the reconciliation exercise and to design the reporting templates;
- the collection of payment data from government agencies and extractive companies, which provides the basis for the reconciliation;
- a comparison of amounts reported by government agencies and extractive companies to determine if there are discrepancies between the two sources of data; and
- contact with government agencies and extractive companies to resolve the discrepancies identified.

3.1. Scoping Study

In accordance with our terms of reference, we carried out a scoping study, which was communicated to the LEITI MSG on matters to be considered in determining the scope for the FY 2023 LEITI report, including:

- materiality threshold for receipts and payments;
- taxes and revenues to be covered;
- extractive companies and government agencies to be included in the report;
- reporting templates to be used; and
- assurances to be provided by reporting entities to ensure the credibility of the data made available to us.

The results of the scoping analysis described in Section 5 of this report were approved by the LEITI MSG.

3.2. Data Collection

Instructions were developed, including reporting templates and reporting guidelines, requesting extractive companies and government agencies to report all required data.

The technical workshop was held on 18 April 2025, during which the IA presented the following:

- reconciliation process;
- reconciliation scope;
- reporting templates and instructions;
- lessons learnt from other reconciliation processes; and
- reconciliation issues.

The reporting package, including the RTs and the instructions for their completion, was sent electronically to the reporting entities.

Extractive companies and government agencies were required to report directly to the IA, to whom they were also requested to direct any queries about the RTs.

3.3. Reconciliation and Investigation of Discrepancies

The process of reconciling the data and investigating discrepancies was carried out between 25 April and 8 August 2025. In carrying out the reconciliation, the following procedures were performed:

- the figures reported by extractive companies were compared item by item to the figures reported by government agencies. Consequently, all discrepancies identified have been listed item by item in relation to each government agency and extractive company;
- where data reported by extractive companies agreed with the data reported by government Agencies, the government figures were considered to be correct, and no further action was undertaken; and
- Government agencies and extractive companies were requested to provide supporting documents and/or confirmation for any adjustments to the information provided on the original data collection templates.

In cases where it was not possible to resolve discrepancies, reporting entities were contacted directly for additional supporting documentation evidencing the payments declared. In certain cases, these differences remained unresolved. The results of the reconciliation exercise are presented in Section 6 of this report.

3.4. Reliability and Credibility of Data Reported

To comply with EITI Requirements 4.3, 4.4, 4.6, 4.9 and 5.2.b, the LEITI MSG agreed on a procedure to address data quality and assurance of information submitted by reporting entities.

To ensure that EITI data submitted by reporting entities had been subject to credible, independent audits, applying international standards on auditing, the LEITI MSG agreed on the following approach with regard to the reporting process by Government Agencies and extractive companies included in the LEITI reporting scope:

- ✓ the declarations made by companies and government agencies should be signed by an authorized senior officer (at management level) and an authorized senior official respectively;
- ✓ the RTs submitted by government agencies included in the reporting scope certified by the GAC who should agree with the government accounts for the reporting period 2023; and
- ✓ the RTs submitted by the extractive companies included in the reporting scope should be certified by an external auditor or the statutory auditor for each company; and
- ✓ all reporting entities selected in the reporting scope would be required to submit their audited financial statements for the reporting period 2023.

For any changes to the information provided in the original data collection templates, supporting documents and/or confirmation from reporting entities would have to be made available to the IA.

3.5. Accounting records

In accordance with Requirement 4.7 of the EITI Standard, data was reported by company, by payment flow and by government agency. Reporting entities were asked to provide relevant details along with the RTs for each payment flow, as well as contextual information.

The reconciliation was carried out on a cash basis. Accordingly, payments made prior to 1 January 2023 were excluded. The same applies to payments made after 31 December 2023.

3.5.1. Extractive companies

Extractive companies usually prepare their accounting records on an accrual basis, i.e., the tax expense is recognized at the time it is due rather than at the time when it is paid. However, for EITI purposes, only amounts actually paid during the reporting period, i.e., from 1 January to 31 December 2023 were disclosed in the RTs.

3.5.2. Government agencies

In respect of government agencies, care was taken to ensure that the amounts shown on the “Payment/Receipt Report” line included all receipts in the reporting period from 1 January to 31 December 2023, irrespective of whether the receipt was allocated in the agency’s records against amounts due in previous or subsequent fiscal years.

4. CONTEXTUAL INFORMATION ON THE EXTRACTIVE SECTORS

4.1. Overview and main prospecting activities

4.1.1. Overview of the mining sector

The mining sector in Liberia is characterized by the wide variety of mineral resources, especially valuable metals such as gold and diamonds as well as industrial minerals like iron ore. These are mainly found in ancient greenstone belts in several regions of the country. Traces of other substances like platinum, uranium and niobium, and base metals such as nickel, cobalt, tin, lead and manganese were also found. Key industrial rocks and minerals mainly include sulphur, phosphates, clays (kyanite), granite, silica sand, heavy mineral sands (rutile & ilmenite) and diabase/dolerite. These minerals exist in both smaller and large quantities across Liberia.

Mining exploration history in Liberia²

The mineral industry has always historically been a key pillar of the country's economic development. Hitherto the 1990s, the minerals sector, particularly iron ore, contributed to over 60% of export earnings and somewhat 25% of GDP³. Iron ore alone contributed more than 20% of the gross national product and provided over 50,000 workplaces, employing nearly 15% of the country's total workforce. Gold and diamonds, in contrast, did not provide a significant contribution to the Liberian economy as they were primarily based on artisanal, small-scale extraction methods and tools.

During the civil disorder that lasted between 1989 to 2003, the mineral sector contribution saw a sharp drop and investments in the sector were curbed. Export of diamonds, a significant mineral sector export, was banned. Large scale mines suspended operations, and some even closed due to civil unrest. As a result, revenues and jobs collapsed, infrastructure was worn out and environmental impacts and overall poverty worsened.

Following the stabilisation of the political environment in the country since 2005, investments in the sector resumed which led to increased exploration and development of mines, especially in gold and diamond mines. The Government of Liberia set a strategy for the mineral sector that aims to institute appropriate policies and fiscal framework to attract investments to enhance its contribution to government revenues. Reforms instituted in the sector especially between 2006 and 2010 triggered significant interest and investment in the sector. The development and amendment of instruments like the Mineral Policy of Liberia (2010), the Mineral Exploration Regulations (2010), the Amended and Restated Public Procurement and Concessions Act (2010) and other broader reform efforts laid the basis for the revival and the effective and transparent management of the sector. These efforts led to improved governance of the sector and saw the granting of major mining concessions to companies like ArcelorMittal Liberia, Ltd., BHP Billiton (Liberia) Inc., China-Union

² <https://nora.nerc.ac.uk/id/eprint/520688/1/1-s2.0-S0169136818300994-main.pdf>

³ [Country-Profile Liberia Final.pdf \(delvedatabase.org\)](#)

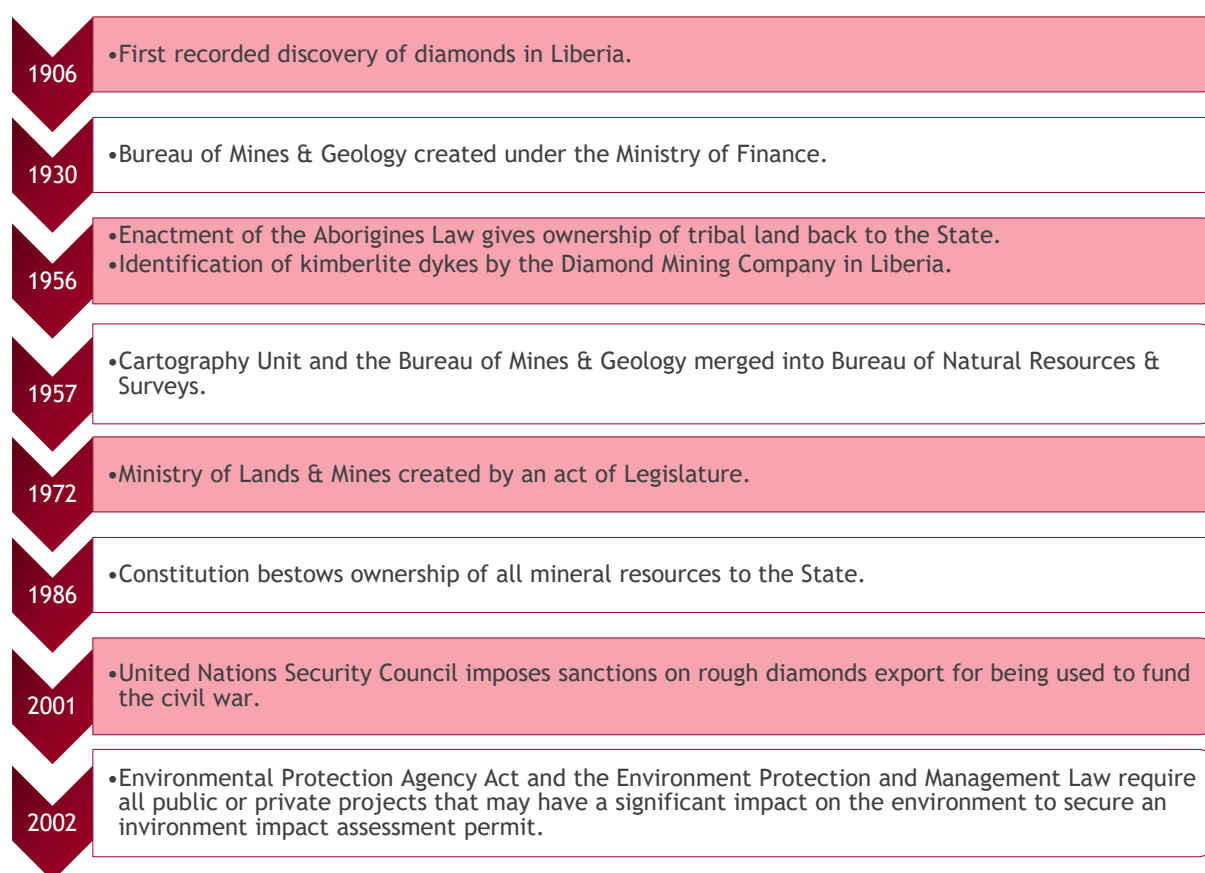
Investment (Liberia) Bong Mines Co., Ltd., Putu Iron Ore Mining, Inc., and Elenilto Minerals & Mining LLC (Western Cluster Limited, Sesa Gao Limited, Bloom Fountain Limited).⁴

This evolution was refrained in 2014 by the expansion of Ebola virus crisis that paralyzed the country's economy, combined with the worldwide fall of commodity prices in the international market. As a result, industrial mining remained limited and, in the absence of a formalized artisanal mining sector and the lack of foreign investment in the sector, mining was not producing the concrete socio-economic benefits envisioned by the government.

The government therefore acknowledges the weaknesses in the legal and regulatory framework governing the extractives sector and has set actions to strengthen it in order to crease transparency and cater to the welfare of small-scale miners while safeguarding the environment.⁵

The following timeline presents the main historical developments in the mining sector in Liberia:

FIGURE 6 : MINING SECTOR HISTORY IN LIBERIA⁶



⁴ Ministry of Mines and Energy (MME)

⁵ [Country-Profile Liberia Final.pdf \(delvedatabase.org\)](#)

⁶ [Country-Profile Liberia Final.pdf \(delvedatabase.org\)](#)



Geological and resources overview

Liberia is located in the center of the Leo-Man Shield, a craton in the southeast portion of the West African craton, across the boundary between the Archaean and Paleoproterozoic domains. The Archaean basement (3260-2850 Ma) extends across central and western Liberia, and is characterized by TTG gneisses, locally migmatite, which are in folded with supracrustal metavolcanic and metasedimentary rocks and intruded by late-Archaean granitoids. Eastern Liberia is underlain by Eburnean age tightly folded paragneiss, migmatite and amphibolite interpreted to be part of the Paleoproterozoic Birimian sequence (2200-2100 Ga). The prominent structural trend throughout most of the country is northeast to east-northeast. Along the coast to the southwest of the Archean basement is a north-northwest trending belt of Archean and Paleoproterozoic age metamorphosed sedimentary and mafic igneous rocks that were deformed during the much younger Pan African orogeny (580 Ma).⁷

These geological characteristics are similar to those of border countries that produce significant levels of gold, iron ore, diamonds, and other precious metals. The Archaean rocks are known for their iron ore deposits within the greenstone belts, with its largest deposits in south-east Guinea. The greenstone belts also host significant gold minerals with majority of them located in in Ghana, Mali, Senegal, Niger, Burkina Faso and Cote d'Ivoire.⁸

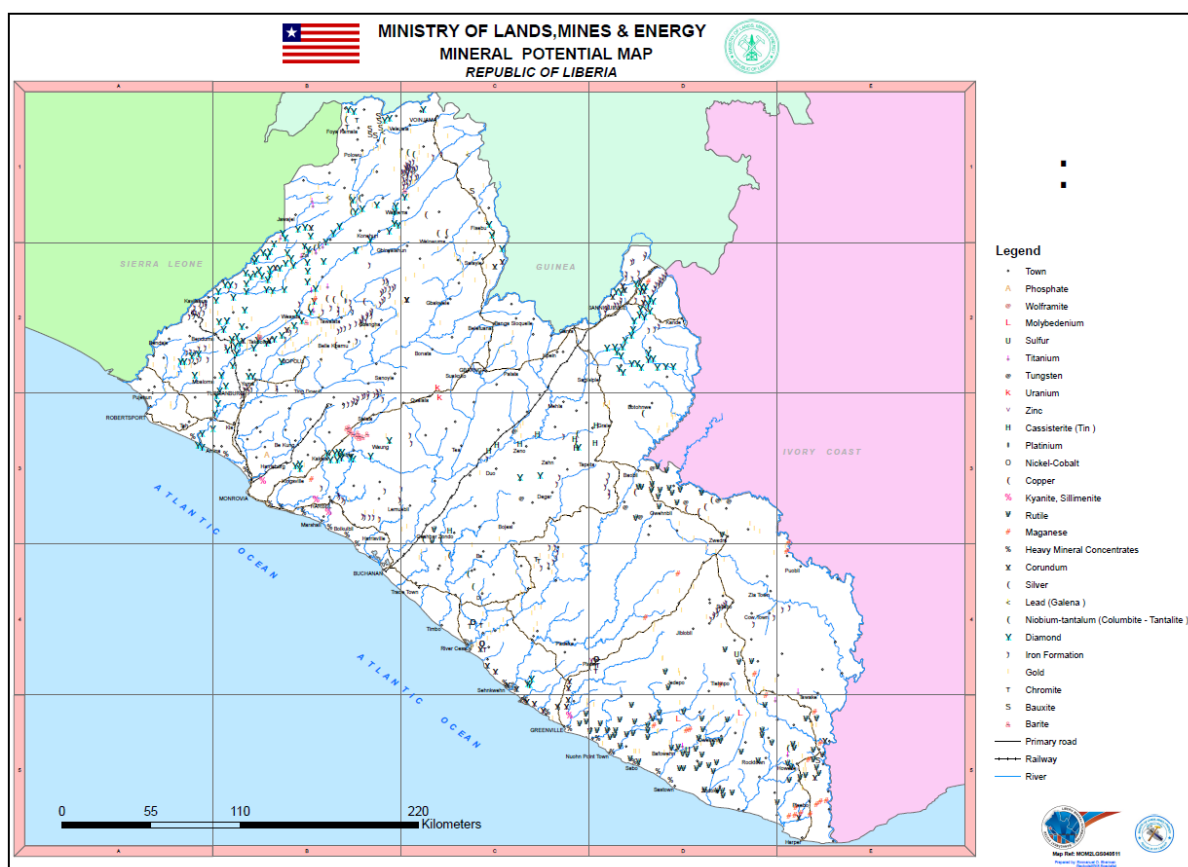
Liberia's geological similarities with its neighbouring countries in the region point to a higher potential of minerals. It is understood that, despite these potentials, Liberia is still an underexplored country. Besides the traditional minerals (iron ore, gold, and diamonds), there is significant potential for other minerals including barite, heavy mineral beach sands (rutile, zircon, ilmenite, and monazite), phosphate, clays, silica sand, copper, zinc, and chromite.⁹

⁷ [Metalite Provides Update on Its Lithium Exploration Activities in Liberia \(accesswire.com\)](https://www.accesswire.com/news/2017/05/11/metalite-provides-update-on-its-lithium-exploration-activities-in-liberia/)

⁸ <https://nora.nerc.ac.uk/id/eprint/520688/1/1-s2.0-S0169136818300994-main.pdf>

⁹ <https://nora.nerc.ac.uk/id/eprint/520688/1/1-s2.0-S0169136818300994-main.pdf>

FIGURE 7 : MINERAL POTENTIAL MAP OF LIBERIA¹⁰



The mineral exploration landscape is equally progressing with advanced stage exploration ongoing for both gold and iron ore. Hummingbird Resources (Liberia) Incorporated holds a Mineral Development Agreement (MDA) with the Government of Liberia to further explore and develop primary gold deposits within its Dugbe MDA area in Southeastern Liberia. Bea Mountain Mining Corporation is conducting near mine exploration within its MDA area in Western Liberia, while also exploring for gold in other parts of the country to increase its gold resources. Zodiac Gold Inc. continues to advance its exploration project over the highly prospective Todi Shear Zone near Monrovia, where drilling has revealed high grade mineralized zones. Zodiac Gold is confident that its Todi Project holds strong potential for the discovery of +1 Moz gold deposits and significant iron ore deposits. West Crest Liberia Ltd. has completed aeromagnetic survey and two drilling campaigns over its Gibi Iron Ore project in Central Liberia. Greenfields Venture Inc. has recently acquired exploration rights over the Mofe Creek Iron Ore Project in western Liberia, with plans to further develop the project. Cavalla Resources Inc. continues to explore the Goe Fantro iron ore deposits in Grand Bassa County. In addition to these exploration initiatives, there are a number of other ongoing exploration projects by different companies around the country.¹¹

According to various media sources, studies funded by China over the last five decades revealed the presence of important Uranium, Lithium, Cobalt, Manganese and neodymium deposits in Liberia, according to a declaration of the President in January 2025. It is believed

¹⁰ https://mlmeliberia.files.wordpress.com/2018/08/mineral-potential-map-of-liberia_april2011.pdf

¹¹ Ministry of Mines and Energy (MME)

that the GoL is currently undergoing discussions with multinational companies as well as local investors to attract around US\$ 3 bn of investment to mine the discovered deposits as well as related investments in infrastructure, renewable energy and technology.¹²

Main exploration, mining and mineral processing projects in Liberia

The table below presents an overview on the main ongoing mining projects in Liberia:

TABLE 17: MAIN ONGOING MINING PROJECTS IN LIBERIA

Project	Commodity	Company	Description
Mount Tokadeh deposit at Yekepa Nimba County	Iron Ore	ArcelorMittal	<p>In 2011 ArcelorMittal commenced mining of the Mount Tokadeh deposit at Yekepa, located about five km west of the now-exhausted Nimba Range deposit. Production from this deposit, which is part of the Western Range Project, is from high-grade oxidised ore, with an average iron content of 60-62%. This ore only requires crushing and screening to make it suitable for export. Total iron ore reserves at Yekepa are 501 million tons at 48.3% purity (Fe).</p> <p>ArcelorMittal signed a pre-agreement in September 2021¹³ amending the initial MDA signed in 2005 to stay for at least 25 more years in Liberia, where it will at least triple its iron ore production and invest an additional US\$ 800 million and is expected to create 1,000 direct jobs, 2,000 temporary construction-related jobs and about 4,000 indirect jobs.</p> <p>The expansion project, which encompasses processing, rail and port facilities will be one of the largest mining projects in West Africa. The project includes the construction of a new concentration plant and the substantial expansion of mining operations. The new concentrator costing a total of US\$ 1.8 bn and was inaugurated in July 2025 and will increase production to 20 million tons per annum. The expansion included also the modernization of infrastructure through the upgrade of the railway between Tokadeh and the port of Buchanan.¹⁴</p>
Bong Mine Bong County	Iron Ore	China-Union Investment (Liberia)	<p>The Bong Mine, about 110 km north-east of Monrovia, is located at the south-western end of the north-east-trending Bong Range which comprises Archaean supracrustal rocks outcropping over a strike length of about 35 km (Kromah, 1974). The mine was operated by the Bong Mining Company between 1965 and 1990 when 158 million tons of medium to high grade iron ore were extracted (International Business Publications, 2013). It was most recently worked by China Union between 2011 and 2015. Further exploration has identified additional resources to the east of the Bong deposit at Goma and in adjacent ('Non-Goma') deposits. The 'Non-Goma' deposits within the Bong Range are estimated to contain 304 million tons ore at 36.5% Fe (Government of the Republic of Liberia, 2009).</p>

¹² <https://www.mining.com/web/liberia-anticipates-new-minerals-discovery-will-draw-3-billion/>

¹³ https://www.investliberia.gov.lr/media/userfiles/subsite_200/files/industries/Mining/Liberia-Minerals-VP-May-2022.pdf

¹⁴ <https://gmk.center/en/news/arcelormittal-opens-a-new-concentrator-in-liberia-with-a-capacity-of-20-million-tons/>

Project	Commodity	Company	Description
Kokoya Mine ¹⁵ Bong County	Gold	MNG Gold Liberia	<p>Kokoya mine is owned by Avesoro Holdings Ltd (formerly MNG Gold Holdings Ltd) through its subsidiary MNG Gold Liberia Inc.</p> <p>In the south of Bong County, a mineral resource (indicated) containing 210,000 oz of gold at a grade of 3.5 g/t Au is reported at Kokoya (MNG Gold, 2015). The mineralization is structurally controlled and hosted in a package of strongly deformed amphibolite's and gneisses.</p> <p>In January 2015 MNG Gold was awarded a Class A gold mining license at Kokoya valid until 2027. Since the acquisition of the Kokoya Gold Project in Bong County, MNG has invested more than US\$15 million in the development of the mine, including the signing of agreements for the purchase of mining equipment, trucks and a processing plant. Some of the equipment has already delivered to Liberia, with further equipment in transit or being ordered.¹⁶</p>
New Liberty Project ¹⁷ Mount County	Gold	BEA Mountain Mining Corporation	<p>New Liberty is a shear zone-hosted gold deposit owned by Avesoro Resources Inc through its subsidiary BEA Mountain Mining Corporation.</p> <p>The key asset in Avesoro Resources' portfolio is the New Liberty Gold Mine, which is Liberia's First and largest commercial gold mine.</p> <p>Construction at New Liberty commenced in April 2014, with first gold poured from the process plant on 31 May 2015 and gold sales commencing in August 2015. Commercial Production was declared at New Liberty on 1 March 2016.</p> <p>New Liberty is an open-pit mining operation, and the process plant has an industry standard flowsheet consisting of a two-stage crushing, ore stockpiling, milling and gravity and carbon in leach plant with an annual throughput capacity of 1.1 million tons of ore.</p> <p>The New Liberty Gold Mine has a Proven and Probable Mineral Reserve estimate of 9.8 million tons grading 3.63 g/t for 1.14 Moz of gold a NI 43-101 and inferred resources of 5.7 million tons at 3.2g/t containing 0.59Moz of gold.</p>
Dugbe gold project Sinoe county	Gold	ARX Hummingbird Resources	<p>The Dugbe gold project is an open-pit mining project that will be developed in Liberia. Spanning 2,559km², the project comprises the Tuzon, Dugbe F and Sackor gold deposits and is supposed to be the largest gold discovery in the country. A feasibility study of the project was released in June 2022, which indicated 14 years of mine life, with significant upside potential for exploration to enhance the resource estimates. The project is expected to produce 2.27 million ounces (Moz) of gold over its 14-year lifetime, with an estimated 200,000 oz average annual production in the first five years of operation. Construction of the project is expected to commence in 2023.¹⁸</p>

¹⁵ https://avesoroholdings.com/wp-content/uploads/2017/09/Avesoro_Holdings_Kokoya_Sept_2017.pdf

¹⁶ https://landmatrix.org/media/uploads/mnggoldcomresimluserfiles/mng_kokoya_appendix_enpdf.pdf

¹⁷ <https://ewsdata.rightsindevelopment.org/projects/34785-new-liberty-gold-project/>

¹⁸ <https://static1.squarespace.com/static/681cec79f333de42f996d472/t/685b644ed534465d8ecd6c6d/1750819933464/Reduced-Dugbe+Gold+Project+NI+43-101+Technical+Report+-+Feasibility+Study-web.pdf>

Artisanal and Small-Scale Mining (ASM)

In the absence of a clear definition in the Mineral and Mining Act (2000), Artisanal and small-scale mining (ASM) is described as largely informal economic sector that involves the use of manual labor and rather simple methods of mining and processing using traditional equipment simple machinery. The aforementioned Law only referred to ASM as “small-scale mining” until 2004 when “artisanal” mining was mentioned in the amendment of the Law.

Overview of the ASM sector in Liberia and its contribution to the Economy¹⁹

The ASM sector in Liberia is largely informal and not well regulated. It is an important sector economically, with activities widespread across the country and an estimated 100,000 artisanal miners especially in rural communities that are interested mainly in the extraction of gold and diamonds, which represents 2% of the Liberian population. It is also believed that almost 1.575 million people are indirectly involved in the ASM activity, 10 to 20% of them are women.

Diamond and Gold ASM contribute to the economy through royalties and taxes paid by licensed dealers. However, while artisanal gold mining is largely informal and unregulated, a significant portion of revenues disappear into informal channels. As a result, governments are deprived of substantial revenues, which could be captured if effective tax regimes were put in place as part of a formalized system.

Given the numerous challenges they face, many artisanal miners are operating at varying degrees of legality, through the payment of informal taxes, based on informal agreements with local government officials. In fact, a significant proportion of unlicensed artisanal miners have, at some point in time, entered into such informal agreements with local mining officials to benefit from tacit permission to start or resume their activities. Such practices offer an alternative to the upfront payment of a license fee and avoid significant losses to the miners in case of unprofitable applications.

The Government seeks to improve the enforcement of regulation on artisanal, small-scale and large-scale mining activities through rigorous monitoring. In fact, concessional agreements will be subject to review for compliance with laws and regulations, and particularly those that benefit the local communities. The Liberian government will encourage corporate social investment with strong local content development framework and strategy for local benefits. A major focus is being placed on strengthening regulatory mechanisms to enhance transparency and to improve the welfare of small-scale miners while safeguarding the environment.

The MME notes that to ensure effectiveness and inclusiveness of formalization, the process requires buy-in, active participation, inclusion and commitment from a range of stakeholders from the government, civil society and traditional community leaders as well as those engage in the formalization process. With increased formal taxation, the government needs to demonstrate reinvestment and support for miners who formalize their operations through technical assistance and access to credit or equipment. Additionally, cooperative structures

¹⁹ [Country-Profile Liberia Final.pdf \(delvedatabase.org\)](#)

were being captured by dealers and Monrovia-based businessmen “to perpetuate existing forms of resource capture and revenue sharing arrangements”.

Liberia's New Pro-Poor Agenda for Prosperity and Development (2018-2023) sets out a new vision for improving mining governance and enforcement of regulations on artisanal and small-scale mining operations throughout the country to develop the sector and therefore increase its productivity. As a result, these convergent policy objectives have led to the government and its development partners strengthening the regulatory frameworks that govern ASM to bolster financial inclusion. This financial inclusion framework for ASM in Liberia was commissioned and developed following a review and analysis of Liberia's financial ecosystems and the country's ASM value chain. It is underpinned by a theory of change which considers all facets of ASM in Liberia to advance financial inclusion through a holistic, integrated, multi-sectoral formalization approach. The framework is also guided by six interconnected principles: access, usage, quality, social, education and infrastructure, which work in unison to achieve the goal of financial inclusion.²⁰

In addition, the GoL is one of the political sponsors, alongside with Cote d'Ivoire, Guinea and Liberia, of the GIZ program “Regional Resource Governance in West Africa” that aims to provide support for the partner countries to change the political, institutional and legal framework conditions to formalize the ASM sector. It works together with Mano River Union government institutions, communities, civil society organizations, and the private sector²¹.

Legal framework of the ASM sector

The main legislation governing the ASM sector in Liberia is as follows:

TABLE 18: MAIN LEGISLATION GOVERNING THE ASM SECTOR IN LIBERIA

Legislation	Description
<u>The Constitution of the Republic of Liberia, (1986)</u>	Article 22 provides that ‘all minerals belong to the Republic and should be used for the benefit of all Liberians’. This article is of specific relevance for ASM, as it confers operators with rights under the Constitution.
<u>Mineral Policy of Liberia, (2010)</u>	This is the main policy instrument that guides the management of the mining sector. Section 9 outlines Liberia's vision for the ASM sector acknowledging its potential economic and developmental benefits as well as the adverse impacts associated with ASM.
<u>Minerals and Mining Law, (2000)</u>	This is the main legal instrument for the licensing and management of the mining sector. The ASM sector is regulated by Class B and Class C licenses.
<u>Environmental Protection and Management Law (2002)</u>	The main objective of this law is to promote the sustainable use of natural resources for socioeconomic development without undermining the environment, so that the environment and natural resources continue to provide benefits for present and future generations.

²⁰ <https://www.afdb.org/en/documents/financial-inclusion-framework-and-implementation-roadmap>

²¹ Promoting responsible resource supply chains - giz.de

Institutional framework of the ASM sector²²

The key institutions involved in the administration and supervision of the ASM activities in Liberia are as follows:

TABLE 19: KEY INSTITUTIONS INVOLVED IN THE ASM SECTOR IN LIBERIA

Institution	Roles and Responsibilities
The Ministry of Mines and Energy (MME)	The main role of MME in the ASM sub-sector is to issue mineral and mining licenses and to ensure that ASM is carried out according to the Minerals and Mining Law. That work includes issuing licenses and monitoring mining activities.
Environmental Protection Agency of Liberia (EPA)	The main role of the EPA in ASM is to ensure that mining is conducted based on Environment Protection and Management Law. That work includes assessing environmental impact assessments, investigating reports of environmental pollution and taking action to correct (remediate or rehabilitate) damage to the environment, and also taking disciplinary actions against those who cause harm to the environment.
The Forestry Development Authority (FDA)	The FDA preserves forests and protected areas and works to prevent mining activities in such areas.

Artisanal and Small-Scale mining licenses

There are two (2) type of licenses that are relevant for ASM sector in Liberia, as follows:

TABLE 20: ARTISANAL AND SMALL-SCALE MINING LICENSES IN LIBERIA

License	Description
Class B Mining License	Class B Mining License holders can use machines to carry out mining and may further sell minerals inside or outside Liberia if in the possession of a dealer license. To obtain a Class B Mining License, it is required that mineral prospecting has been performed, and that a mineral reserve has been identified.
Class C Mining License	A Class C Mining License is a license to work on a 25-acres claim on an alluvium/placer deposit, and it may only be awarded to Liberian nationals over the age of 18. One applicant/miner(s) can have up to four (4) of such mining licenses. Class C miners are overall encouraged to form and work in Cooperatives.

ASM activities and their locations²³

The table below provides an overview of commonly exploited minerals in Liberia's ASM sector, their activities and their locations:

²² [Handbook for Artisanal and Small-Scale Miners](#)

²³ [Africa Natural Resources Management & Investment Center \(ANRC\). 2022. Financial Inclusion Framework and Implementation Roadmap. An Innovative Financial Inclusion Framework to Support Artisanal and Small-scale Mining Formalisation in Liberia.](#)

TABLE 21: OVERVIEW OF ASM SECTOR MINERALS, ACTIVITIES AND LOCATIONS

Minerals	ASM activities and locations
Diamond	<p>Liberia's largest diamond reserves are in the west, near the border with Sierra Leone. However, there are also some occurrences in the alluvial deposits of Kakata, Bolola and Sannaquellie, near the border with Guinea and Ivory Coast.</p> <p>Ore extraction commonly involves the dredging of riverbeds, often accompanied by river diversion. The practice of diving for alluvial ore is also practiced in Liberia. Processing to recover the diamonds usually involves washing the alluvial ore in shaker-boxes and hand jigs, followed by hand sorting to pick out the diamonds.</p> <p>The actors in this value chain include license holders where the claims are licensed, miners and processors referred to as “diamond boys”, supporters and financiers, dealers and exporters.</p>
Gold	<p>The occurrence of gold is widespread in Liberia. The deposits are alluvial, eluvial (saprolite) and hard rock (usually hosted by quartz veins). The type of ore extraction is determined by the type of ore deposit.</p> <p>Alluvial deposits are exploited through both dredging and riverbank mining, often mined by so-called “gold boys”.</p> <p>Eluvial deposits usually involve open pit mining either manually or with excavators (colloquially referred to as “yellow machines”).</p> <p>Mining hard rock deposits usually involves rock breaking with hammers and chisels or jackhammers where the operation is semi-mechanized, and sometimes the use of explosives (although their use is not allowed in Class C operations).</p> <p>Processing involves crushing and milling rock, usually manually, but simple mechanical crushers are often used, with the most common being a hammer mill that feeds directly onto a sluice box.</p> <p>The pre-concentrate from the sluice box is panned to upgrade the gold concentrate. At this stage mercury is often added to produce an amalgam that is eventually burnt to evaporate the mercury, leaving the gold behind. The purity of this gold is usually about 95%.</p> <p>The actors in this value chain include license holders where the claims are licensed, miners and processors (referred to as “gold boys”), supporters and financiers, dealers and exporters. Suppliers of inputs include those that provide equipment, explosives and mercury.</p>
Development minerals (mostly sand and aggregate)	<p>The exploitation of development minerals used in construction occurs near settlements and built-up areas. Sand occurs as alluvial deposits near rivers, as well as eluvial deposits in the case of pit sand. This is extracted either manually with shovels in micro-operations or with excavators in semi mechanized operations.</p> <p>Usually, the sand is sold by the truckload with no further processing. Aggregate exploitation is of hard rock, usually granite or similar rock types. Rudimentary exploitation involves breaking large boulders and crushing it using hammers. More mechanized operations use jackhammers and explosives to break the rock in quarries. The rock is then crushed using mechanical crushers and the final aggregate is sold by the truckload.</p> <p>The actors in the value chains of these construction materials depend on whether the operations are basic manual operations or mechanized. In manual operations there are rock breakers (usually men), and crushers (who are often women). For the most basic operations, transportation is by wheelbarrows and motorbikes, and for larger, more mechanized operations lorries are used.</p>

The maps below show the location of Class “B” and “C” licenses in Liberia:

FIGURE 8: MAP SHOWS THE LOCATION OF CLASS B LICENSES IN LIBERIA

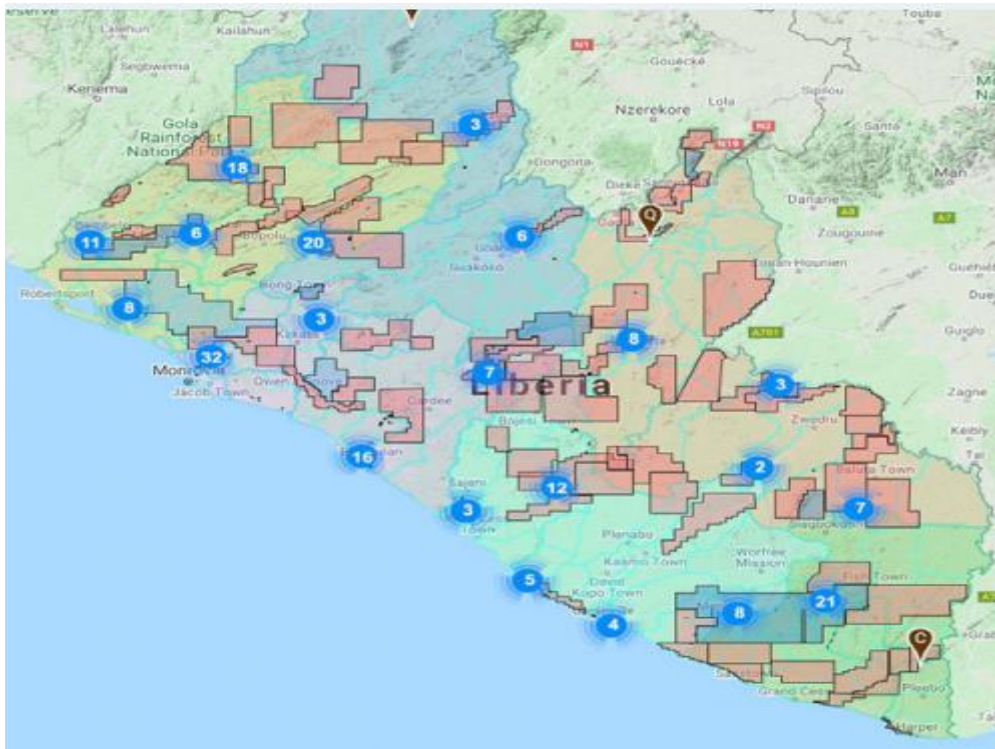
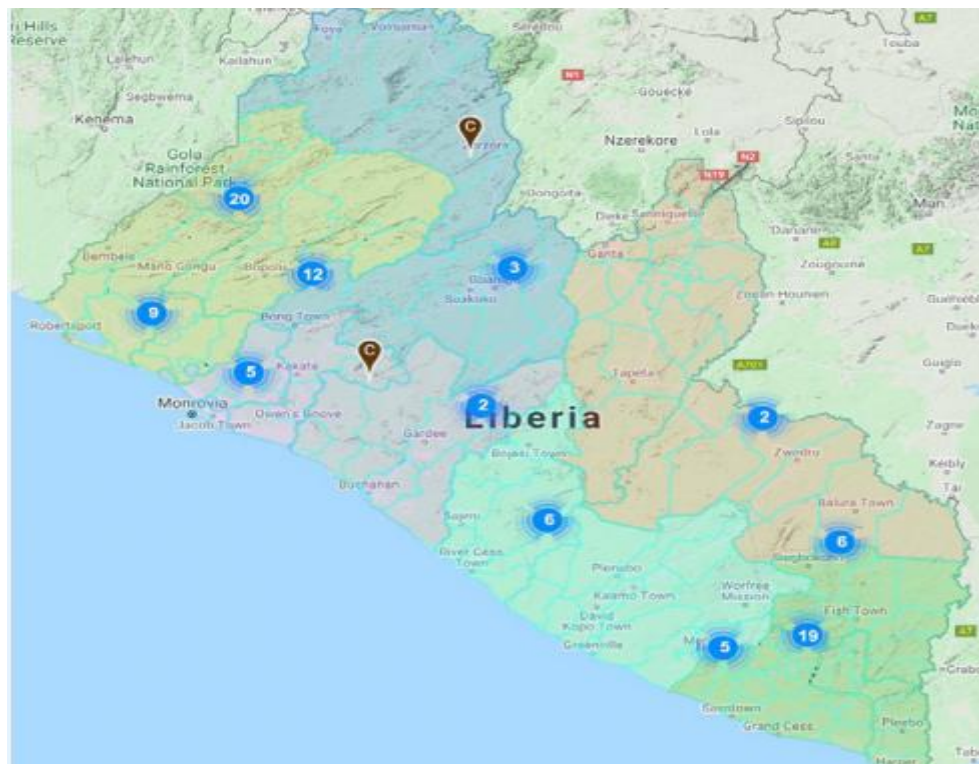


FIGURE 9 :MAP SHOWS THE LOCATION OF CLASS C LICENSES IN LIBERIA



ASM sector socio-economic, environmental, health and safety impacts²⁴

The table below provides an overview of the main socio-economic, environmental, health and safety impacts of the ASM sector in Liberia.

TABLE 22: ASM SECTOR SOCIO-ECONOMIC, ENVIRONMENTAL, HEALTH AND SAFETY IMPACTS

Type of impact	Main impacts of ASM in Liberia
Socio-economic impacts	<p>The main socio-economic challenges associated with ASM in Liberia include:</p> <ul style="list-style-type: none"> - Lack of access to finance; - Unequal benefits from the proceeds of the mining; - Illicit mineral trade (including transboundary export) which is associated with an inaccurate valuation of minerals (where miners fail to receive a fair price), and mineral theft; - Unequal power relations between miners, supporters and financiers leading to exploitation; - Child labor; - Gender inequality where women are disadvantaged through unequal access to mineral deposits, and disproportionately high exposure to mercury pollution; - Poor labor practices, including working hours, poor safety practices; - High costs of mining license, survey and clearance fees are barriers to formal entry into the sector; and - Intra-community tension (between community and miners) when miners' activities cause negative environmental and social impacts.
Environmental impacts	<p>The environmental impacts of ASM in Liberia include:</p> <ul style="list-style-type: none"> - Mercury use by Artisanal and Small-Scale Gold Miners (ASGM) in Liberia is widely reported as the element is often used for the final gold extraction step. It commonly results in the toxin being released into the environment; - Unrehabilitated mined-out areas are frequently reported in ASM areas. Mining pits are not regularly backfilled causing health impacts associated with water borne diseases and safety hazards to the unsuspecting; - Poor handling of mining waste, and discharge of waste into natural water bodies is commonly reported at mining processing areas in Liberia; and - Encroachment of mining into protected areas and subsequent deforestation has been reported as a problem of national concern. This is driven by the informal nature of ASM and associated with low levels of regulatory compliance. The limited capacity of regulatory agencies means that the level of enforcement is low.
Health and safety impacts	<p>The health and safety impacts of ASM in Liberia include:</p> <ul style="list-style-type: none"> - The release of mercury vapors from the burning of amalgam by artisanal miners in Liberia exposes them to mercury toxins and enables mercury to enter the food chain causing negative health impacts; - Injuries and death from the lack of Personal Protective Equipment (PPE). It is common practice in Liberia that miners do not use PPE and work-related injuries are frequent; - Exposure to dust from poor dust suppression practices and lack of appropriate PPE is reportedly common and will lead to occupational diseases such as silicosis. However, as the practice of mining is so informal, data has not been collected on this or other health issues; and

²⁴ [Africa Natural Resources Management & Investment Center \(ANRC\). 2022. Financial Inclusion Framework and Implementation Roadmap. An Innovative Financial Inclusion Framework to Support Artisanal and Small-scale Mining Formalisation in Liberia.](#)

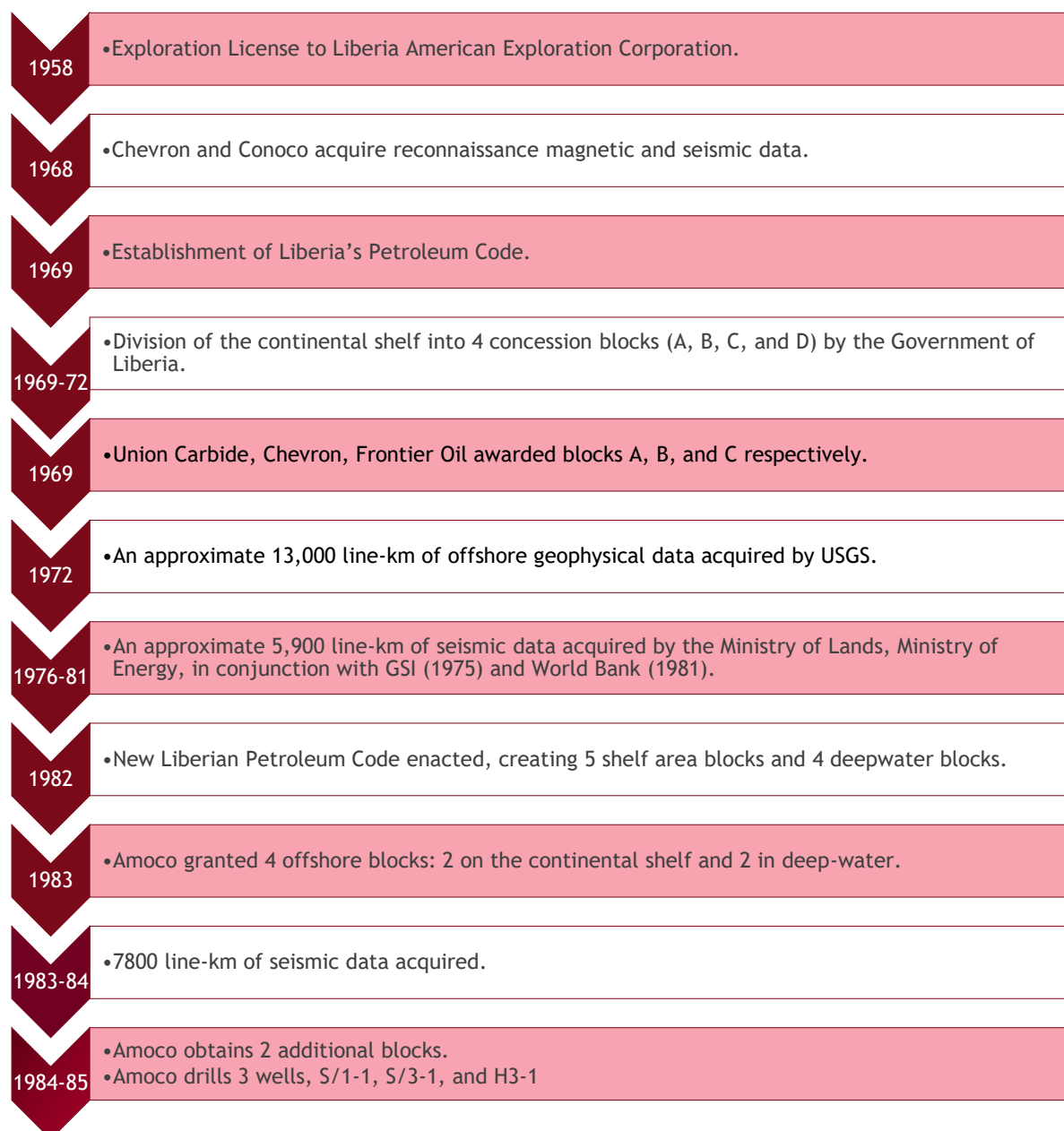
Type of impact	Main impacts of ASM in Liberia
	<ul style="list-style-type: none"> - Poor sanitation and hygiene practices are prevalent in Liberia. Reportedly, many ASM sites do not have toilets or clean drinking water for the workers. This increases the prevalence of waterborne diseases and illness for workers and host communities.

4.1.2. Overview of the oil and gas sector

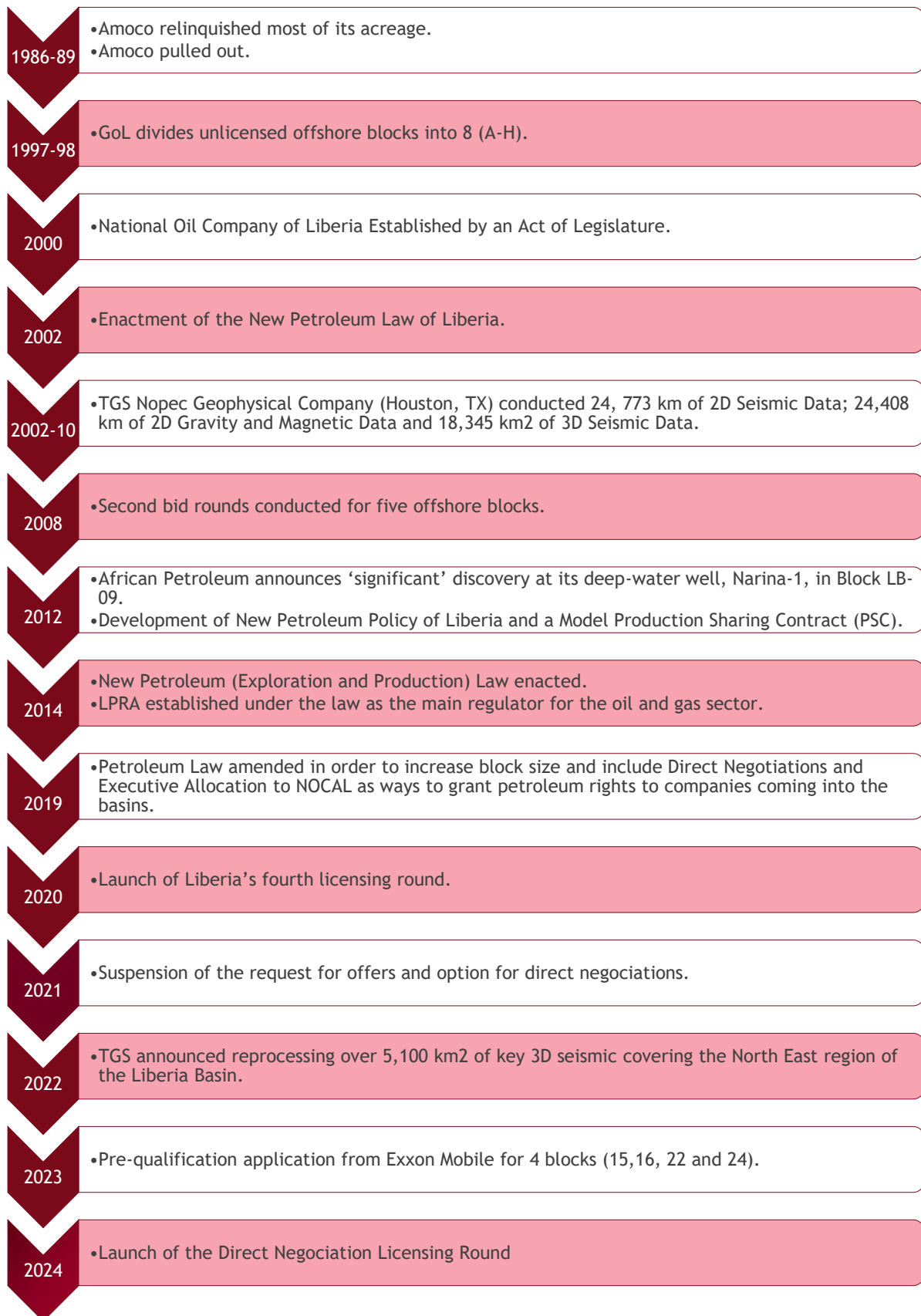
Petroleum exploration history in Liberia

The timeline below presents the major historical stages in the oil and gas sector in Liberia:

FIGURE 10 : OIL & GAS SECTOR HISTORY IN LIBERIA²⁵



²⁵ <https://nocaltest.wordpress.com/about/background-on-liberias-oil/#:~:text=Liberia's%20quest%20for%20oil%20and,and%20Chevron%20Oil%20Company%20Liberia.>



Geological and resources overview

The Liberia offshore acreage is demarcated into thirty-three (33) offshore blocks with sizes ranging from over 2,256 km² to 3,432 km² area. To date, seventeen (17) wildcat exploratory wells have been drilled in the area, along the shelf and deepwater domains. Some of the wildcat wells drilled had oil shows in shelfful reservoirs and some proved non-commercial oil discoveries in deepwater. Post well analysis has proven the existence of a working petroleum system for the Cretaceous plays.

The map below shows the 33 offshore blocks in Liberia:

FIGURE 11 :MAP SHOWS THE OFFSHORE BLOCKS IN LIBERIA²⁶



The table below shows the detailed size per offshore block:

²⁶ <https://www.nocal.com.lr/offshore-map>

TABLE 23: SIZE PER OFFSHORE BLOCK OF THE LIBERIA BASIN²⁷

Block	Block Area (km ²)	Total 3D in block (km ²)	Total 2D in Block (km)
LB-01	2,996	1,760	677
LB-02	3,431	1,491	499
LB-03	3,274	651	253
LB-04	2,986	425	170
LB-05	3,187	844	235
LB-06	3,001	128	409
LB-07	2,935	1,612	971
LB-08	3,419	2,711	1,113
LB-09	3,117	2,930	1,056
LB-10	3,025	2,802	990
LB-11	3,023	2,687	861
LB-12	2,811	214	817
LB-13	3,088	-	888
LB-14	2,981	-	859
LB-15	3,247	166	975
LB-16	3,134	1,865	1,006
LB-17	3,276	418	821
LB-18	3,368	9	633
LB-19	3,404	-	949
LB-20	3,072	-	851
LB-21	2,205	-	534
LB-22	3,301	-	969
LB-23	3,293	-	892
LB-24	3,314	-	913
LB-25	2,445	186	366
LB-26	2,482	525	464
LB-27	2,300	525	464
LB-28	2,256	-	407
LB-29	3,272	-	971
LB-30	3,391	1,547	1,001
LB-31	3,051	2,250	876
LB-32	2,322	656	753
LB-33	2,332	-	661

²⁷ <https://lpra.gov.lr/licensing-round-2024/>

Main projects in the oil and gas upstream sector in Liberia²⁸

The Government of Liberia launched in February 2020 the fourth licensing bid round covering 33 offshore blocks within the offshore Liberia acreage, including Harper basin. With a total 2D seismic data of 24,773 kilometers, this bid offers a new investment opportunity to international oil companies that expressed their interest in the area that offers significant exploration potential in one of the few remaining unexplored deep-water basins in West Africa. Several sub-commercial discoveries have proven that the petroleum systems are working offshore Liberia.

Due to several significant factors including the recent investment climate, among which the latent impact of the energy transition and the impacts of COVID-19 pandemic outbreak, and following a 6-month extension of the bid round, the GoL has indefinitely suspended the 2020 bid round and opted for Direct Negotiations in order to simplify the process to international exploration and production companies and to make the investment opportunity in Liberia more attractive to external capital.²⁹

The Direct Negotiation process was launched on 1st June 2021 and covers the same 33 offshore blocks. In April 2023, LPRA has announced that it has received pre-qualification application from ExxonMobil for four offshore blocks in Liberia. ExxonMobil expressed interest in Blocks 15, 16, 22 and 24 within the Liberia Basin and the company has now officially applied to be pre-qualified to negotiate for the Blocks. To date, there is no information on the negotiation or signature of a production sharing contract between the company and the LPRA for the Blocks.³⁰

Apart from the 4th round of direct negotiations, the NOCAL has also a Joint Industry Project with Core Lab, which provides a comprehensive and up-to-date geological evaluation of well data from the Equatorial Atlantic Transform Basins of Liberia. The fully integrated project database, incorporating stratigraphy, reservoir description and regional geology, will utilize rock material and well log data from 17 offshore exploration wells.

In August 2024, the LPRA launched the 2024 Direct Negotiations Licensing Round covering the remaining 29 offshore blocks pursuant to the expression of interest of ExxonMobil referred to above. The blocks made available for direct negotiations are LB-1 to LB-14, LB-17 to LB-21, LB-23, and LB-25 to LB-33. These blocks located in both Liberia and Harper Basins include a mix of deep offshore and shallow water blocks. The Direct Negotiations Licensing Round brochures fixed 15 October 2024 as a due date for applicants to submit their applications for Operator prequalification, while the identification of blocks of interest shall be done by no later than 15 November 2024. The brochure did not preview a deadline for negotiations.³¹

As of the date of establishment of this EITI report (22 August 2025), no information has been provided on any production sharing contract signed or negotiated by GoL with an Oil & Gas company.

²⁸ [AME-Liberia-Direct-Negotiations-2021-R02.pdf \(hubspotusercontent-na1.net\)](#)

²⁹ <https://lpra.gov.lr/lpra/gol-extends-licensing-round-2020-incorporates-new-flexible-and-attractive-commercial-terms-the-government-of-liberia-announces-direct-negotiations-for-33-offshore-blocks>

³⁰ <https://mailchi.mp/1a3ff1ff6af0/lpra-receives-pre-qualification-application-from-exxonmobil?e=ece56ef69e>

³¹ https://lpra.gov.lr/wpfd_file/001-2024-liberia-licensing-round-invitation-to-participate/

4.1.3. Overview of the forestry sector

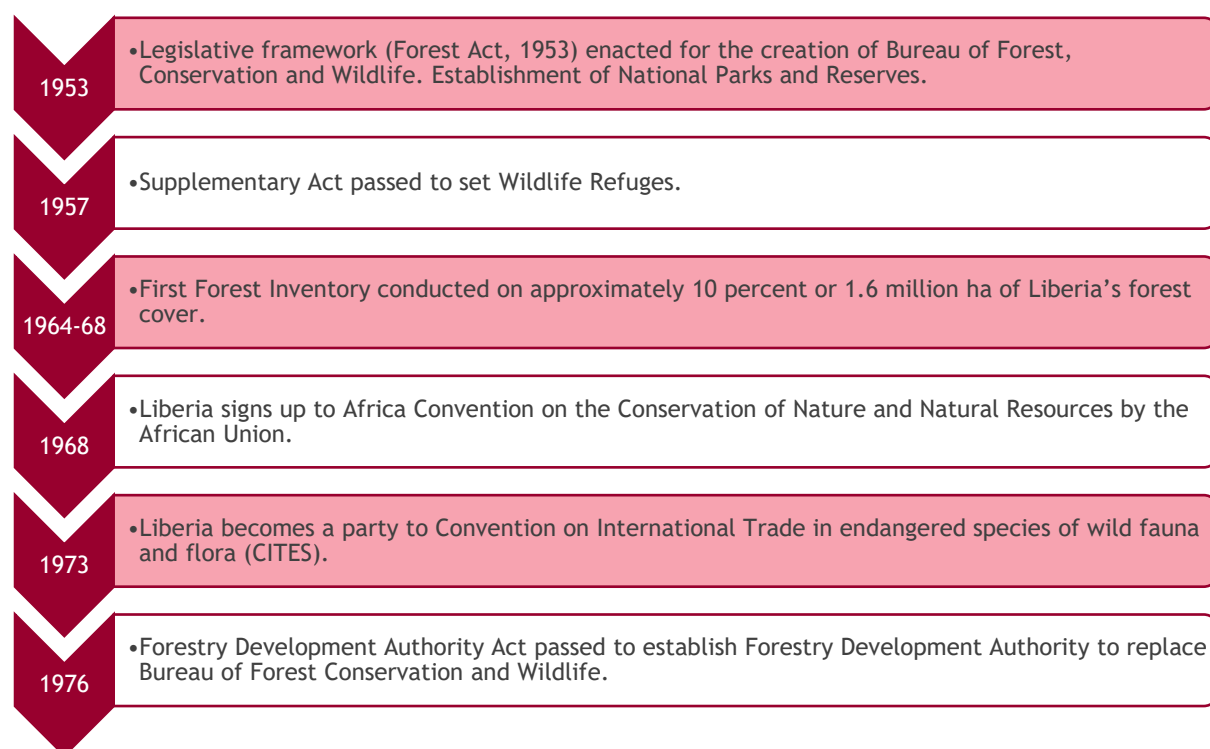
Forestry sector history in Liberia³²

Liberia possesses rich forest resources and is considered the most forested country in the West African region, with 69% of Liberia's land surface covered by forests. Liberia is believed to be the only country in the region that was historically covered entirely with rain forest. Liberia's forest is made up of approximately 6.69 million hectares (Mha) of lowland tropical forest that comprise 43% of the remaining Upper Guinea forests of West Africa.

Despite the high rate of deforestation, forestry resources still provide a vital ecosystem to inhabitants of rural Liberian communities. They also contribute to the national economy and provide rich a biodiverse home to multiple species of flora and fauna. Forests provide a crucial source of income, jobs, and food security for households as almost half of the population who live within 2.5 kilometers of a forest earn 35% of their income from the forest. Furthermore, Liberia's forests are home to 881 known fauna species, out of which 0.8% are endemic and 4.2% threatened, plus c. 2,200 flora species of vascular plants, 4.7% of which are endemic.

The timeline below presents the major milestones undergone by the GoL in relation to the forestry sector:

FIGURE 12 : LIBERIAN FORESTRY SECTOR HISTORY



³² National Household Forest Survey, (2018-2019), Forestry Development Authority of Liberia. <https://www.forestcarbonpartnership.org/system/files/documents/Liberia%20National%20Forest%20Inventory.pdf>



Geological and resources overview

Liberian forests represent more than half of the remaining rainforests in the West Africa region and are mostly characterized by moist evergreen forests and semi-deciduous forests (predominantly in the north). Liberia remains the only country in the West African sub-region where a significant portion (43%)³³ of the remaining Upper Guinea forest ecosystem can be identified and measured in practical sense. Liberia's forests are recognised by the international community as sensitive areas, making them a focus for conservation efforts worldwide.

FIGURE 13: MAP OF WEST AFRICA'S FORESTS³⁴



Forested land covered around 7.6 million hectares in 2020, thus representing about 68% of Liberia's total surface. The vast majority of these forested lands are primary or otherwise naturally regenerated forest, with just c. 8,000 ha of planted forest.³⁵

The Protected Forest Area Network Act (2003) aims to cover at least 30% of the existing forest area of Liberia, representing around 1.5 million hectares. According to Fauna & Flora of Liberia and other sources, Liberia currently has five main protected forest areas: the Sapo National Forest (Sinoe County), the East Nimba Nature Reserve (Nimba County), the Lake Piso Multiple Use Reserve, the Gola National Forest Park (Gbarpolu County) and the Grebo-Krahn National Park (River Gee County/Sinoe). These areas cover a total area of 454,800 ha, which represents 4.1 % of the country's area.

Reports have indicated that hunters, loggers, and miners have largely impacted these conserved forests. Efforts are underway to protect additional areas and to link existing protected regions by using the forests that lie between them.

Liberia has five 'Wetlands of International Importance' designated under the Ramsar Convention on Wetlands. Mount Nimba was recently designated an 'Alliance for Zero Extinction' Site, while the 'Upper Guinea Rivers and Streams' WWF Global 200 site that straddles the border of Liberia is recognized as a critical region for freshwater conservation.

³³ <https://thedocs.worldbank.org/en/doc/b5041dc7ec8b02907f78e2ff41a82711-0360012023/original/Liberia-Forest-and-Climate-Resilience-Forum-2023-Concept-Note.pdf>

³⁴ https://fda.gov.lr/sites/default/files/documents/doc_1320_1.pdf

³⁵ <https://openknowledge.fao.org/server/api/core/bitstreams/a5c8a432-bd2e-4768-92e9-446a4d8af889/content>

A proposed protected area and the closest to gazettelement, Wonegezi Forest, is a pilot site for the REDD+ program in Liberia.

The number of proposed areas for protection continues to increase pursuant to the discovery of the presence of endangered species and of diminishing ecosystems. The GoL response resulted in the ratification of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), the Convention on Biological Diversity (CBD) and the Convention on the Conservation of Migratory Species of Wild Animals (CMS).

The current deforestation rate in Liberia is estimated at 30,000 ha / year (-0.7%), with conversion for agriculture, uncontrolled logging and mining being the main drivers of deforestation.

According to the International Tropical Timber Organization (ITTO) biennial review, the Liberian industry produced about 451,000 m³ of industrial round wood in 2020, with a sharp decrease of almost 100,000 m³ (-18%) compared to 2018 production. Yet, the majority of the wood production, including firewood and wood for construction, is used in the domestic market and is largely unregistered. The civil war (1989-2003) destroyed the forest industry and rural infrastructure, and consequently round logs currently account for the bulk of export volumes.

Timber is mostly exported via the main ports of the country: the freeport of Monrovia and the ports of Buchanan, Greenville and Harper (near Pedebo, a crossing point to Ivory Coast). While Harper and Greenville are known as main outlets for the timber industry, only containerized logs and processed-wood products can be shipped out of Monrovia, while the three other ports accept both logs (in bulk) and containerized logs or products. Containerization is becoming the most popular export method out of Liberia. Only self-loading ships operate in Liberia as ships cannot berth at Harper. As a result, logs and timber products must be transferred to the ships by barges or rafts of floating logs.³⁶

Main projects in the forestry sector in Liberia

The table below summarizes the four ongoing projects supervised by the FDA:

TABLE 24: MAIN ONGOING PROJECTS IN THE FORESTRY SECTOR³⁷

Project	Description
REDD+	<p>The aim of Liberia REDD+ is to encourage the country to contribute to climate change mitigation efforts by: i) reducing greenhouse gas emissions (GHG) by slowing, halting and reversing forest loss and degradation; and ii) increasing removal of GHGs from the earth's atmosphere through the conservation, management and expansion of forests.</p> <p>The county has shown interest in REDD+ and was required to progress through three phases, which are closely linked. These include:</p> <ul style="list-style-type: none"> - readiness phase, involving the development of national strategies or action plans, REDD+ mitigation actions, and capacity building; - implementation of national strategies and results-based demonstration activities, enacting REDD+ actions and national strategies or plans that

³⁶ Source: <https://www.timbertradeportal.com/countries/liberia/>

³⁷ [Projects | Forestry Development Authority \(fda.gov.lr\)](#)

Project	Description
	<p>could involve further capacity building, technology development and transfer, and results-based demonstration activities; and</p> <ul style="list-style-type: none"> - Results-based actions that must be fully measured, reported and verified.
FLEGT-VPA	<p>Through the Voluntary Partnership Agreement, Liberia can issue verified legal timber products with FLEGT licenses. The advantage of this is that FLEGT-licensed products automatically meet the requirements of the EU Timber Regulation (EUTR), which prohibits EU operators from placing illegally harvested timber and timber products on the EU market.</p> <p>The EUTR entered into force in 2013. It requires EU operators to perform due diligence checks to ensure the timber products they place on the EU market are legal. FLEGT-licensed timber meets the due diligence requirements under the EUTR.</p>
International Water Resources Management	<p>The GEF-funded “Mano River Ecosystem Conservation and International Water Resources Management (IWRM) Project” is being implemented by the International Union for Conservation of Nature (IUCN). It targets the conservation and sustainable use of the transboundary water basins and their biodiversity resources within the Mano River Union member states, among which Liberia with a total area of 111,370 km² (15%).</p> <p>The project is being implemented in the Upper Guinea forest covering Sierra Leone, Guinea, Liberia and Ivory Coast with the objective of strengthening the management of transboundary natural resources for sustained ecological benefits and improved livelihoods for the forest adjacent communities.</p>
Liberia Chimpanzee Rescue & Protection	<p>This project is a combined chimpanzee sanctuary, protection, and conservation organization in Liberia rescuing chimpanzees who are victims of illegal bushmeat and live pet trades that aims to confiscate, rescue and rehabilitate orphaned chimpanzees.</p>

4.1.4. Overview of the Agriculture sector

Geological and resources overview of the agriculture sector in Liberia³⁸

Agriculture is the primary economic sector in the country as it provides livelihood for more than 68% of Liberia’s population with an overall contribution of 30% of Liberia’s 2022 real gross domestic product (GDP). It provides sustenance for many households engaging in cassava and rice that form the primary staple of food crops, in addition to rubber, oil palm, cocoa, or sugarcane production. More households engage in cassava production than any other food crop. However, overall agricultural productivity is low as it is mainly based on traditional, small-scale farming systems and techniques that rather rely on labor force than machinery. As a result, Liberia imports more than 80% of its rice, making the country vulnerable to global food price volatility.

The poor integration of the sector resides in the lack of basic infrastructure such as developed machinery, farming equipment/tools, farm-to-market roads, fertilizers and pesticides and food storage capacity. The main cash crops and foreign exchange earners are rubber, oil palm, rice, and timber.

Rubber is one of the dominant revenue generators, as it represents 7.6% of the country’s total export receipts and 54.9% of agriculture exports in 2023³⁹. Various estimates put the

³⁸ <https://www.trade.gov/country-commercial-guides/liberia-agricultural-sectors>

³⁹ Source: LEITI reporting templates

number of people employed by commercial rubber farms at 20,000 and the number of smallholder households involved in growing rubber trees at 35,000. However, no baseline study provides definite statistics. The Firestone Natural Rubber concession, covering almost 200 square miles, is the largest contiguous natural rubber operation in the world and the biggest private sector employer in Liberia.

Palm oil, a traditional domestically consumed product, also plays a major role in the country's economy with a total contribution of 6% of total export receipts⁴⁰. There has been some interest from both smallholders and large investors in expanding cash crop production. However, access to market is a concern to most of them. Stakeholders in the palm oil sector include smallholder farmer cooperatives, individual farmers, large multinational-owned corporations and concessionaires, as well as individuals playing various intermediary roles and providing support services.

Concessionaries still struggle with land rights awarding process in Liberia. Despite the promulgation of the Land Rights Act in 2018 that clarified land tenure, only a comprehensive implementation of the law could resolve uncertainty around land ownership. Furthermore, the lack of capital and professional expertise to increase farms productivity presents a barrier to investment in the agriculture sector, which deprives the country of considerable opportunities to increase its outcome from the sector.

Similarly, farmers' ability to access valuable markets and improved inputs to increase production is limited by the poor quality of the country's network of roads. During the rainy season that lasts from May to September, movement from rural areas is significantly restrained due to heavy rainfall, especially in lowland swamp areas. As a result, smallholders tend to sell produce in local markets where prices are relatively lower. Despite the government's current initiative to rehabilitate main roadways and some key feeder roads in productive areas, more work is demanded to improve roads network and bridge infrastructure in remote rural areas.⁴¹

Liberia has a favorable climate and fertile soil for cocoa production and there has been substantial investment in the rehabilitation of cooperative and smallholder farms. The country's international partners, such as the International Fund for Agricultural Development (IFAD) continue to invest in cocoa smallholder producers to improve livelihoods and raise incomes by modernizing cocoa farming, increasing production, and developing market access. Small scale cocoa production will likely increase as farmers continue to reclaim and rehabilitate their farms. As with the agricultural sector in general, smallholder cocoa farmers and local cooperatives suffer from inadequate farm-to-market roads, lack of familiarity with measurement and quality standards, lack of storage facilities, and limited access to up-to-date price and market information. According to FAO, cocoa beans exports duplicated between 2018 and 2021 with 19 tons for US\$ 40.8 million against 10 tons for US\$ 18 million in 2018.⁴²

⁴⁰ Source: LEITI reporting templates

⁴¹ [Stakeholder-Engagement-Plan-SEP-Liberia-Rural-Economic-Transformation-Project-P175263.docx \(live.com\)](#)

⁴² Source: FAOSTAT

Main projects in the agriculture sector in Liberia

Concerned by the importance of the agriculture sector in Liberia's economy, the GoL conducted several projects to promote the sector and enhance its productivity. The table below showcases the main ongoing projects in the agriculture sector:

TABLE 25: MAIN ONGOING PROJECTS IN THE AGRICULTURE SECTOR⁴³

Project	Donor	Timeframe	Description
Smallholder Agriculture Development For Food And Nutrition Security - Additional Financing ⁴⁴	AfDB	2023 - 2026	<p>The project development aims to improve food and nutrition security and reduce poverty of targeted rural populations in Liberia through a US\$ 9.91 million envelope dedicated to:</p> <ul style="list-style-type: none"> - increased agricultural production and productivity of smallholder farmers; - improved smallholders' value addition, market access, an income; and - strengthening the capacity of the government institutions, farmers, and produce organizations.
Rural Economic Transformation Project (RETRAP)	World Bank	2021 - 2029	<p>The project seeks to contribute to creating long-term economic opportunities for actors in selected value chains through a threefold approach, by:</p> <ul style="list-style-type: none"> - strengthening critical institutions overseeing the development of the sector; - intervening at various level of the supply chain to build capacity and support investment subprojects to improve the agricultural productivity and climate resilience of the agri-food system; and - improving rural access and agricultural marketing by upgrading selected roads and rural markets.
Smallholders Agriculture Transformation and Agribusiness Revitalization Project (STAR-P)	World Bank	2019 - 2024	<p>The project aims to increase agricultural productivity and commercialization on the part of smallholder farmers for the vegetable, rice and oil palm value chains in selected counties of Liberia.</p> <p>The geographic area will indicatively consist of the following counties: Bomi, Gbarpolu, Grand Cape Mount, Grand Gedeh, Lofa, Margibi, Maryland, Nimba and Sinoe.</p>

⁴³ <https://www.moa.gov.lr/general/projects>

⁴⁴ [liberia - smallholder agriculture development for food and nutrition security - additional financing - project appraisal report.pdf](#)

Project	Donor	Timeframe	Description
Building Climate Resilience Project (BCRP)	International Fund for Agriculture Development	2019 - 2026 on:	<p>The project targets 25,000 beneficiaries (10,000 rice producers, 10,000 cocoa producers and 5,000 other smallholder farmers) in Bong, Lofa and Nimba counties and aims to promote agriculture as a business for enhanced incomes and reduced rural poverty in the targeted counties, with a main focus</p> <ul style="list-style-type: none"> - climate-proofed agricultural production and post-harvest diversification; - climate resilient rural infrastructure; and - institutional capacity development and policy engagement.
Tree Crops Extension Project (TCEP)	International Fund for Agriculture Development	2017 - 2023 2019 - 2025	<p>This project, throughout its two phases, seeks to improve incomes and climate change resilience of 8,000 smallholder cocoa producers and 3,000 additional farmers and youths in Nimba county as well as 15,000 beneficiaries in Lofa county. The main objectives of the project are:</p> <ul style="list-style-type: none"> - revitalizing cocoa plantation; - rehabilitating and maintaining Farm-to-Market roads; and - providing services for value-chain development.

4.2. Legal and Institutional Framework

This section presents a summary description of the legal and institutional frameworks as well as the fiscal regime governing the mining sector.

4.2.1. Legal framework of the mining sector

4.2.1.(a) Legislation governing the Mining Sector

The mining sector is regulated by the following main policies, legislations and regulations:

TABLE 26: MINING SECTOR LEGAL FRAMEWORK

Legislation	Description
Policies	
<u>Mineral Policy of Liberia, (2010)</u>	The Mineral Policy of Liberia sets out the strategic direction for the responsible and equitable development of the country's mineral resources. It seeks to ensure that the sector contributes to sustainable economic growth, poverty reduction, and social development. The policy places emphasis on transparency, good governance, environmental management, and community participation, with the aim of ensuring that the benefits of mining extend beyond revenue generation to support national development and democratic governance.

Legislation	Description
Legislations	
<u>The Constitution of the Republic of Liberia, (1986)</u>	The Constitution is the supreme law of Liberia. Article 7 requires that the nation's economy and natural resources be managed in a manner that maximizes citizen participation, promotes equality, and advances both the welfare of the Liberian people and the country's economic development. This constitutional provision underpins local content requirements in the mining sector, including the reservation of Class C mining licenses for Liberian nationals.
<u>Minerals and Mining Law, (2000)</u>	The Minerals and Mining Law of 2000 is the primary legislation governing the mining industry in Liberia. It regulates reconnaissance, exploration, development, and mining activities on land, waterways, territorial waters, and the continental shelf. The law affirms state ownership of all mineral resources and establishes the licensing framework for mineral rights. It also includes provisions for environmental protection, community engagement, and compliance, thereby setting the foundation for both domestic and foreign investment in the sector.
<u>Revenue Code of Liberia (2000) and as Amended in 2011</u>	The Revenue Code establishes the legal framework for taxation in the mining sector. Sections 700 to 714 specifically address mining-related taxation, including corporate income tax, royalties, surface rents, withholding tax, dividends, capital allowances, and other fiscal obligations. The 2011 amendments strengthened revenue collection and aligned Liberia's tax regime more closely with international best practice.
<u>Land Rights Act, (2014)</u>	The Land Rights Act defines the legal framework for land ownership, use, and administration in Liberia. It categorizes land into different classes (public, government, customary, and private) and outlines the processes for acquisition, transfer, and dispute resolution. The Act is particularly relevant to the mining sector, as it provides clarity on land tenure and the rights of communities affected by mining operations.
<u>Environmental Protection and Management Law (2002)</u>	This law establishes the legal and institutional framework for environmental governance in Liberia, implemented primarily through the Environmental Protection Agency (EPA). It requires Environmental Impact Assessments (EIAs), audits, and monitoring of mining projects, and sets environmental standards to ensure safe and sustainable mining operations. The law incorporates key international environmental principles, such as the precautionary principle, the polluter-pays principle, inter-generational equity, public participation, and international cooperation in managing shared environmental resources.
<u>Model Mineral Development Agreement, (2008)</u>	The Model Mineral Development Agreement provides a standardized template for contracts between the Government of Liberia and potential investors. It ensures consistency and transparency in negotiations, covering fiscal terms, social obligations, environmental safeguards, and operational commitments. Its purpose is to balance investor interests with the government's objective of maximizing national benefits from the mining sector.
Regulations	
<u>Regulations Governing Exploration under a Mineral Exploration License under the Minerals and Mining Law (2000)</u>	These regulations, issued under the Minerals and Mining Law, set out the administrative procedures and technical requirements for exploration activities. They cover license applications, reporting obligations, work program approvals, environmental safeguards, and compliance monitoring, providing clarity for both regulators and license holders during the exploration phase.

4.2.1.(b) Institutional framework of the mining sector

The mining sector is regulated by multiple institutions with clear mandates and responsibilities. These include responsibilities in allocation of rights, application of taxations, environmental management, export and imports of materials, financial related activities, among others. The primary regulator is the Ministry of Mines and Energy; however, several other institutions play other relevant roles in the regulation of the mining sector.

The key institutions involved in the administration of the mining sector in Liberia are as follows:

TABLE 27: MINING SECTOR INSTITUTIONAL FRAMEWORK

Institution	Description of Roles and Responsibilities
<u>The Ministry of Mines and Energy (MME)</u>	<p>The MME is responsible for the coordination and formulation of mineral and energy policies and legislation. The Ministry plays a dual role as a policy maker and regulator of mineral activities, particularly the development of policies, laws, allocation of rights between the government of Liberia and potential investors, as well as the day-to-day regulation of the mineral sector.</p> <p>Furthermore, the Ministry monitors and enforces compliance of all policies, laws and regulations pertaining to research, exploration, development and exploitation of mineral, water, and energy resources in Liberia.</p> <p>Overall, the ministry comprises three divisions:</p> <ul style="list-style-type: none"> ▪ <u>Division of Operations</u> <p>The Division of Operations is headed by a Deputy Minister for Operations followed by the Assistant Minister for Mines and the Assistant Minister for Mineral Exploration and Environmental Research. This division oversees the following departments:</p> <ul style="list-style-type: none"> - Liberian Geological Survey; - Hydrological Survey; - Bureau of Mines; - Bureau of Economic Forecast and Concession Appraisal; - Mineral Cadastre Unit; - Integrated Coastal Zone Management Unit; - Mining Inspectorate; and - Office of Precious Minerals. <ul style="list-style-type: none"> ▪ <u>Division of Administration</u> <p>The division of Administration provides support to the operations of the Ministry. This Division is headed by a Deputy Minister for Administration and is separated into four 3 departments, with each playing a distinct but coordinated role in meeting the objectives of the Division. These include Personnel, Finance & budget and Procurement departments.</p> <ul style="list-style-type: none"> ▪ <u>Division of Planning</u> <p>The statutory mandate of the Department of Planning is to collaborate with heads of departments in planning and implementing technical operations and capacity building programs of the Ministry. This Department consists of two divisions: Bureau of Planning and Bureau of training and Human Resource Development (HRD).</p>
<u>Ministry of Finance and Development Planning (MFDP)</u>	<p>The Ministry of Finance and Development Planning (MFDP) bears the responsibility to formulate, institutionalize and administer economic development, fiscal and tax policies for the promotion of sound and efficient management of financial resources of Liberia. With regards to the Mining sector, the ministry plays a leading role in the formulation of fiscal terms. The Ministry also contributes to contract negotiations.</p>

Institution	Description of Roles and Responsibilities
Liberia Revenue Authority (LRA)	<p>The LRA's mandate is to enforce all applicable tax laws in Liberia, including those in the mining sector. Through its Natural Resources Division under the Domestic Tax Division, the LRA conducts tax assessments and issues invoices for all companies that own or operate in the ministry mining sector, the collection of all tax liabilities.</p> <p>Furthermore, its customs Division, under the customs code and regulations, bears the responsibility for the collection of import and export duties and the facilitation of exportation/importation of any outputs/inputs related to the mining sector in Liberia.</p>
Environmental Protection Agency of Liberia (EPA)	<p>The Environmental Protection Agency regulates environmental management and protection across all sectors, including mining. It is tasked with enforcing the Environmental Protection and Management Law, conducting Environmental Impact Assessments (EIAs), issuing environmental permits, and monitoring mining companies' compliance with environmental standards. The EPA also implements international environmental conventions to which Liberia is a party, ensuring that mining activities are environmentally sustainable.</p>
National Bureau of Concessions (NBC)	<p>The National Bureau of Concessions oversees the implementation of concession agreements, including Mineral Development Agreements (MDAs). It monitors companies' compliance with social obligations, such as community development commitments, employment of Liberians, and infrastructure contributions. The NBC works closely with sector ministries to ensure that concession agreements benefit both the state and local communities.</p>

4.2.1.(c) Fiscal regime of the mining activities

The key legal frameworks providing for the mineral sector's fiscal regime in Liberia are:

- [Revenue Code of Liberia \(2000\) and as Amended in 2011](#);
- [Minerals and Mining Law, \(2000\)](#); and
- [Regulations Governing Exploration under a Mineral Exploration License under the Minerals and Mining Law \(2000\)](#).

The fiscal regime for the mining sector in Liberia includes the following:

TABLE 28: MAIN PAYMENT STREAMS IN THE MINING SECTOR

Taxes	Description	Rate	Reference
Corporate Income Tax	Taxes are assessed as a percentage of the net profits of a project after deducting allowable expenses. These vary most often based on what deductions are allowed and how they are calculated and monitored.	30% on taxable income from a mining project.	Section 701 to 703 and 705 of Liberia Revenue Code (LRC)
Government equity participation	The Government shall receive free of charge an equity interest in all Class A Mining Operations.	Mineral equity participation between 10% - 15%	Section 9.22 of the Mining and Minerals Law (2000)
Cost Recovery for mining production assets	An amount of money spent on asset that can be deducted from tax owed to the government. This is often based on a maximum allowable deduction.	A mining project is allowed to recover the cost of a mining production asset on an asset-by-asset basis using the straight-line method over a five (5) year period at the rate of 20% per year.	Section 706 of LRC

Taxes	Description	Rate	Reference
Royalties	A royalty is due and payable to the Government of Liberia at the time of each shipment and in the amount of the stated percent of the value of commercially shipped mineral, regardless of whether the shipment is a sale or other disposition.	<ul style="list-style-type: none"> - Iron ore: 4.5% - Gold and other base metals: 3% - Commercial diamonds: 5% 	Section 704 of LRC
Surface Rents	A producer who has a mineral exploration license or a Class A mining license shall pay an annual surface rent.	<ul style="list-style-type: none"> - Exploration license: US\$ 0.20 per acre. - Mining License area: Year 1 to 10 - US\$ 5 per acre Year 11 to 25 - US\$ 10 per acre 	Section 704 of LRC
Mineral exploration license fees	Fees paid for authorization and permit to conduct mineral exploration activities.	An annual License fee of US\$ 5,000 is due and payable in advance for each year of the License Term.	Section 12.2 of Regulations governing exploration under a mineral exploration license
Application processing fees	Fees to be paid when applying for grant renewals, or transfers of mineral exploration license.	<ul style="list-style-type: none"> - Processing application or extending a license term: US\$ 5,000. - Suspension of exploration: US\$ 2,500. - Application to amend approved work program and budget: US\$ 2,500. - Application for pilot mining and recovery program: US\$ 10,000. - Application for transfer or change of control: US\$ 2,500. 	Section 12.3 of Regulations governing exploration under a mineral exploration license
Stability Provisions for mining projects	When entering into a mineral agreement, the Government of Liberia is permitted to accept a clause stabilizing some aspects of taxation to the terms under the Revenue Code provisions for a period not to exceed 15 years from the effective date of the agreement.	<p>15-year stability period on taxes including:</p> <ul style="list-style-type: none"> - Income tax rate. - Royalty rate. - Special rule for extended net operating loss carry-forwards. - Special rule for depreciation and other cost recover mechanisms. - Exemptions for input supplies. - Exemption for property rates on Real property within a mineral exploration license area, a mining license area, or used for a mining project. - Exemptions from import duties. 	Section 17 of LRC

4.2.2. Legal framework of the oil and gas sector

4.2.2.(a) Legislation governing the Oil and Gas sector

The Oil and gas sector is regulated by the following main policies, legislations and regulations:

TABLE 29: OIL AND GAS SECTOR LEGAL FRAMEWORK

Legislation	Description
Policies	
<u>National Petroleum Policy of Liberia (2012)</u>	The Petroleum Policy of Liberia was developed in 2012 with the overall objective of directing the management of Liberia's petroleum resources in an environmentally responsible manner, optimizing returns to achieve equitable distribution of accrued benefits.
Legislations	
<u>The Constitution of the Republic of Liberia, (1986)</u>	The Constitution is the supreme law of Liberia. Under Article 7 of the Constitution, it requires the economy and natural resources of Liberia to be managed in a way that ensures the maximum feasible participation of Liberian citizens under conditions of equality to advance the general welfare of the Liberian people and the economic development of Liberia.
<u>Petroleum (Exploration and Production) Act (2014) and as Amended in 2019</u>	<p>The Petroleum (Exploration and Production) Act (PEPA) is the primary legislation for the oil and gas sector in Liberia. It establishes a fiscal and legal regulatory framework for the management and regulation of petroleum activities in accordance with Articles 7 and 22(b) of the Constitution of the Republic of Liberia. Specifically, it provides the basis for ownership of petroleum and petroleum rights; institutional arrangements, including the establishment of NOCAL and LPRA; licensing, tendering for and granting of petroleum agreements; definition of forms and types of petroleum agreement, state participation; citizen participation; environmental health and safety; and local content and participation.</p> <p>Under the original law, the allocation of petroleum rights was only to be conducted through international competitive tendering. However, in 2019 the law was amended to include allocation of rights through direct negotiations with potential investors and executive allocation to NOCAL. In addition, new blocks were configured in the same year to align with international standards.</p>
<u>The National Oil Company of Liberia Act (2000) and as Amended in 2014</u>	The Law establishes NOCAL as the national oil company with the mandate to engage in petroleum exploration, development and production on behalf of the State; lift and market State's entitlement of crude petroleum taken in-kind; hold and manage all interests acquired by the State in all Petroleum agreements or production-sharing agreements; and encourage the development of national capabilities in all aspects of petroleum exploration, development and production, among other things.
<u>Model Production Sharing Contract (2020)</u>	The model PSC is intended to guide the contracting and negotiation processes between the government of Liberia, NOCAL and potential investors. It provides look-alike terms and conditions of a PSC, including contractors' obligations of NOCAL and the government of Liberia obligations; taxation and royalties; accounting methods and audit; State participation and Citizen Participation; among other relevant areas.

Legislation	Description
Revenue Code of Liberia (2000) and as Amended in 2011	The Law stipulates determinative legal provisions for the petroleum sector in Liberia. Specifically, Sections 740 to 754 covers overall taxation in the sector, including the definition of key Petroleum taxation terms, corporate income tax, royalties, surface rents, withholding tax, dividends, capital allowance, among other tax-related structures.
Environmental Protection and Management Law (2002)	The Law establishes a legal framework for the overall protection and management of the environment by the Environment Protection Agency of Liberia in partnership with regulated Ministries and organizations and in a close and responsive relationship with the people of Liberia. Specifically, it provides the legal basis for the conduct of Environmental Impact Assessments, Audit and Monitoring of petroleum projects; setting of Environmental Standards that ensures safe and secure petroleum activities in Liberia; protection of biodiversity and national heritage sites, maintenance of pollution controls; implementation of International Environment Protocols; among other administrative processes in the oil and gas sector.
Regulations	
Reconnaissance License Fees & Application Requirement for onshore Areas (2019)	Regulates the application process and fees for reconnaissance licenses in onshore petroleum areas, establishing clear requirements and procedures for license applicants.
Reconnaissance-License-Regulation-Offshore (2022)	Establishes the regulatory framework for reconnaissance licensing in Liberia's offshore petroleum areas, including application requirements, fees, and procedural standards.

4.2.2.(b) Institutional framework of the Oil and Gas sector

The main government agencies involved in the oil and gas sector in Liberia are set out in the table below:

TABLE 30: OIL AND GAS SECTOR INSTITUTIONAL FRAMEWORK

Institution	Description of Roles and Responsibilities
Liberia Petroleum Regulatory Authority (LPRA)	<p>LPRA is responsible for the overall regulation of upstream oil and gas activities. It conducts technical evaluation and research to advise on the opening of areas to petroleum operations. LPRA also manages the allocation of rights in coordination with other relevant agencies; and bears the mandate to enter into petroleum agreement on behalf of the State. Finally, LPRA reviews and approves licenses, and monitors and enforces compliance on petroleum operations through inspections, investigations, and audits.</p> <p>Overall, the Authority comprises three departments:</p> <ul style="list-style-type: none"> ▪ <u>Department of Technical</u> <p>The department of technical services is responsible for leading the Authority's program on geophysical assessment and data management, evaluation for areas to be included in bid rounds, health, safety and environment management, exploration drilling including regulating international oil companies, etc. Headed by a Deputy Director-General, the department ideally contains two major units:</p> <ul style="list-style-type: none"> - Exploration unit; and - HSE (Health Safety and Environment) unit. <ul style="list-style-type: none"> ▪ <u>Department of Operation</u> <p>Headed by a Deputy Director-General, the department is generally responsible for information communication technology (ICT) and general services (GS). Its programs are coordinated and managed through two significant units:</p>

Institution	Description of Roles and Responsibilities																		
	<ul style="list-style-type: none"> - IT unit; and - General services unit. <p>▪ <u>Department of Administration</u></p> <p>The department of administration mainly handles the general administration of the Authority, including procurement and human resources related activities. It is headed by the Deputy Director-General for Administration and supported by two key units:</p> <ul style="list-style-type: none"> - Procurement unit; and - HR unit. 																		
<u>National Oil Company of Liberia (NOCAL)</u>	<p>NOCAL is an oil company wholly owned by the state with the responsibility of managing the State's interests in all petroleum agreements. It also engages in petroleum exploration, development, and production on behalf of the State. NOCAL is required under the Petroleum Law to lead the development of local capabilities in all aspects of upstream oil and gas activities, including ensuring the transfer of technology to Liberians.</p>																		
Hydrocarbon Technical Committee (HTC)	<p>HTC has the mandate to lead contract negotiations in the oil and gas sector. With the power to negotiate petroleum agreements on behalf of the government, decisions on the conclusion of agreements become binding on all parties, including potential investors and government agencies with responsibilities in the oil and gas sector.</p> <p>According to the National Petroleum Policy of Liberia of 2012, the HTC comprises the following eight (8) members:</p> <table border="1"> <thead> <tr> <th>Member</th><th>Position</th></tr> </thead> <tbody> <tr> <td>President & CEO, NOCAL</td><td>Chairman</td></tr> <tr> <td>Minister of Justice</td><td>Member</td></tr> <tr> <td>Minister of Finance</td><td>Member</td></tr> <tr> <td>Legal Advisor to the President</td><td>Member</td></tr> <tr> <td>Minister of Lands, Mines, & Energy</td><td>Member</td></tr> <tr> <td>Minister of Labor</td><td>Member</td></tr> <tr> <td>Chairman, National Investment Commission</td><td>Member</td></tr> <tr> <td>Executive Director Environmental Protection Agency</td><td>Member</td></tr> </tbody> </table>	Member	Position	President & CEO, NOCAL	Chairman	Minister of Justice	Member	Minister of Finance	Member	Legal Advisor to the President	Member	Minister of Lands, Mines, & Energy	Member	Minister of Labor	Member	Chairman, National Investment Commission	Member	Executive Director Environmental Protection Agency	Member
Member	Position																		
President & CEO, NOCAL	Chairman																		
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Minister of Lands, Mines, & Energy	Member																		
Minister of Labor	Member																		
Chairman, National Investment Commission	Member																		
Executive Director Environmental Protection Agency	Member																		
<u>The Ministry of Mines and Energy (MME)</u>	<p>The MME is responsible for the coordination and formulation of energy policies and legislation, including upstream petroleum policies. With the establishment of LPRA, MME's responsibilities in the upstream sector is limited to the policy formulation, legislative coordination, and contribution to contract negotiations at the level of the Inter-Ministerial Hydrocarbon Technical Committee. Through its bureau of Hydrocarbons, the MME coordinates stakeholders on policy discussions related to the upstream petroleum sector.</p>																		
<u>Ministry of Finance and Development Planning (MFDP)</u>	<p>The MFDP bears the responsibility to formulate, institutionalize and administer economic development, as well as manage fiscal and tax policies for the promotion of sound and efficient management of the country's financial resources. With regards to the upstream oil and gas sector, the MFDP plays leading role in the formulation of fiscal terms and conditions during contract negotiations.</p>																		
<u>Environmental Protection Agency of Liberia (EPA)</u>	<p>The Environmental Protection Agency (EPA) is mandated to protect and manage Liberia's environment, including activities in the upstream petroleum sector. EPA collaborates with LPRA and other relevant stakeholders to monitor and supervise petroleum operations, enforce environmental legislation,</p>																		

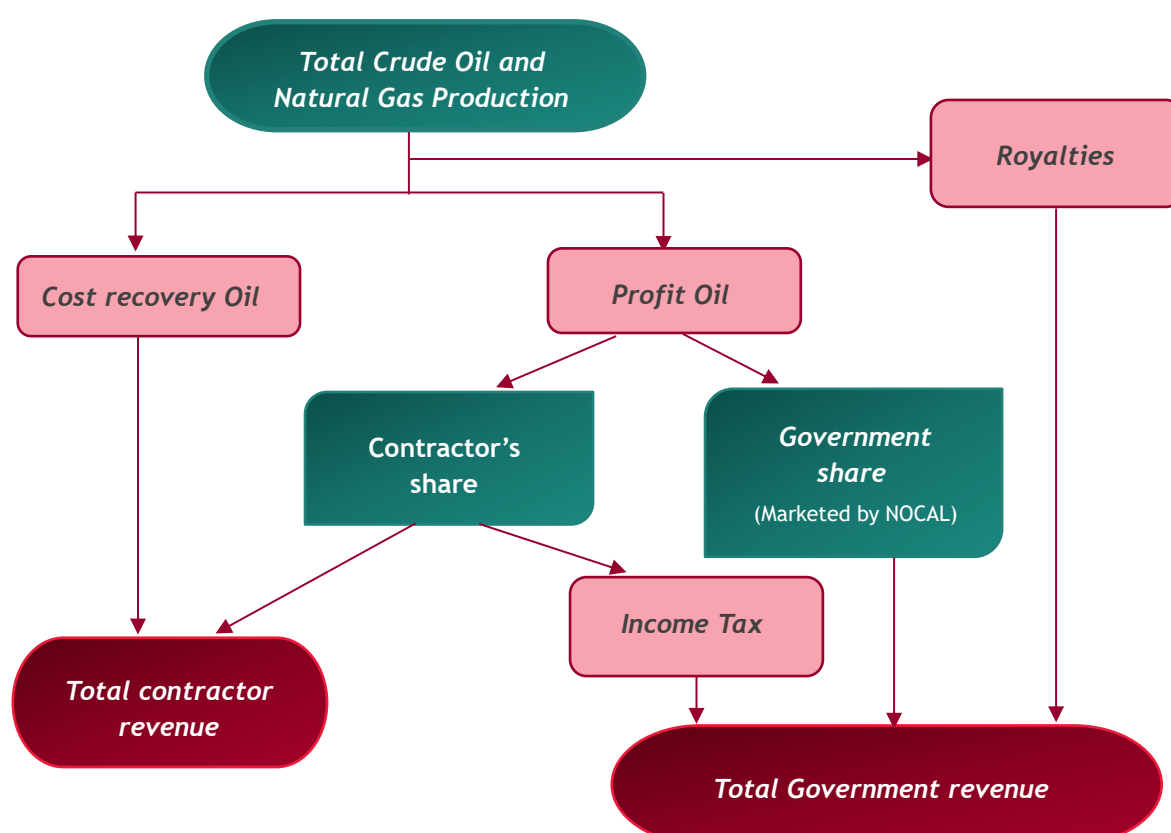
Institution	Description of Roles and Responsibilities
	conduct Environmental Impact Assessments and Strategic Environmental Assessments, and ensure compliance with national and international environmental standards. The agency is also responsible for developing environmental monitoring reports and overseeing environmental obligations during the entire lifecycle of petroleum projects, including decommissioning.
Liberia Revenue Authority (LRA)	<p>LRA's mandate is to enforce all applicable tax laws in Liberia, including those relating to the Upstream Petroleum sector. Through its Natural Resources Division under the Domestic Tax Division, LRA conducts tax assessments and issues invoices for all companies that own or operate in the oil and gas sector, for the collection of all tax liabilities.</p> <p>Furthermore, its customs Division, under the Customs code and regulations, bears responsibility for the collection of import and export duties, and the facilitation of exportation and importation of any outputs/inputs required in the upstream petroleum sector.</p>

4.2.2.(c) Fiscal regime of the Oil and Gas activities

PSC fiscal regime mechanism

The fiscal regime for the oil and gas sector in Liberia is mainly based on a Production Sharing Contract (PSC) based on which oil companies are contracted by Government and are rewarded an agreed share of the production. The fiscal provisions of a PSC constitute four main components including royalties, cost recovery oil, profit oil, and income tax as shown in the figure below:

FIGURE 14: PSC FISCAL REGIME MECHANISM



Main payment streams in the oil and gas sector

The main oil and gas sector payment streams according to the model of the Production Sharing Contract (2020) are detailed as follows:

TABLE 31: MAIN PAYMENT STREAMS IN THE OIL AND GAS SECTOR

Taxes	Description	Rate	Reference
Government Equity Participation	The State shall have the right to receive free interest participations in the Contractor's rights and obligations under the Petroleum Contracts.	State Participation (Free Interest): 5% Citizen Participation (Free interest): 5%	Articles 17.1 & 17.2 of Model PSC (2020)
Royalties	A petroleum agreement shall provide for the payment of royalties on the value of total production of petroleum from the contract area, excluding such quantities as are used, reinjected, or unavoidably lost in the petroleum operations, at the percentage rate(s) specified therein. Such royalties shall be paid into the Consolidated Fund.	8% for Crude Oil total production 5% for Natural Gas total production	Article 15.3 of Model PSC (2020)
Cost Recovery for Oil and Gas Projects	For the purposes of recovery of Petroleum Costs with respect to any Exploitation Area, the Contractor may freely take each calendar month from each of the Net of Royalty Production of Crude Oil and the Net of Royalty Production of Natural Gas.	70% of Net of Royalty Production	Article 14.3 of Model PSC (2020)
Profit Oil	The quantity of Crude Oil and Natural Gas from an Exploitation Area remaining after the Contractor has taken from the Net of Royalty Production the portion shall be shared between the State and the Contractor according to the Contractor's nominal pre-tax rate of return from the conduct of Petroleum Operations with respect to an Exploitation Area.	Based on Pre-tax rate of return (ROR) for production area: 19% or less ROR: 25% State and 75% contractor 19% to 25% ROR - 45% State and 55% contractor Above 25% ROR - 70% State and 30% contractor	Article 14.4 of Model PSC (2020)
Corporate Income Tax	Taxes are assessed as a percentage of the net profits of a project after deducting allowable expenses. These vary most often based on what deductions are allowed and how they are calculated and monitored.	15% on the Contractor's taxable income.	Article 15.2 of Model PSC (2020)
Surface Rents	Surface rentals shall be payable to the Government of Liberia into the consolidated account per square kilometer of the Contract Area remaining at the beginning of each Contract Year.	First exploration phase: US\$ 50 per sq. km Second exploration phase: US\$ 75 per sq. km Third exploration phase: US\$ 100 per sq. km Exploitation Areas: US\$ 150 per sq. km	Article 16.1 of Model PSC (2020)
Signature and production bonuses	A lump sum payment charged at a point in a project timeline.	US\$8,000,000 within thirty (30) days of the Effective Date as signature bonus. US\$5,000,000 when the combined Total Production of Crude Oil from all Exploitation Areas within the Contract Area first reaches the average rate of 30,000 barrels per day during a period of 30 consecutive days.	Article 16.2 of Model PSC (2020)

Taxes	Description	Rate	Reference
		US\$ 7,000,000 when the combined Total Production of Crude Oil from all Exploitation Areas within the Contract Area first reaches the average rate of 50,000 barrels per day during a period of 30 consecutive days. US\$ 10,000,000 when the combined Total Production of Crude Oil from all Exploitation Areas within the Contract Area first reaches the average rate of 100,000 barrels per day during a period of 30 consecutive days.	
Contribution to the Hydrocarbon Development Fund	The Contractor shall make a one-time contribution to the Hydrocarbon Development Fund. This contribution shall be paid into a separate subaccount of the Consolidated Fund established for the sole purpose of holding the contributions made to the Hydrocarbon Development Fund pursuant to this and other petroleum agreements.	US\$ 500,000 within thirty days of the Effective Date of the Contract.	Article 16.4 of Model PSC (2020)
Contribution to the Rural Renewable Energy Fund	The Contractor shall make an annual contribution to the Rural Renewable Energy Fund into a separate subaccount of the Consolidated Fund established for the sole purpose of holding the contributions of the Rural Energy Fund pursuant to this and other petroleum agreements.	US\$ 100,000 per year.	Article 16.4 of Model PSC (2020)

Discrepancies in Fiscal Regime

Liberia's fiscal regime or terms for all sectors are enshrined in the Liberia Revenue Code 2000 (as Amended in 2011). However, we found the discrepancies below between the Royalties rates and corporate tax rates in the Revenue Code and Model PSC (2020):

TABLE 32: DISCREPANCIES IN THE OIL AND GAS SECTOR FISCAL REGIME

Fiscal Term	Revenue Code	PSC Model
Royalties	10% for Crude Oil	8% for Crude Oil
	10% for Natural Gas	5% for Natural Gas
Corporate Tax Rate	30% of taxable income	15% of taxable income

4.2.3. Legal framework of the forestry sector

4.2.3.(a) Legislation governing the forestry sector

The main policies, laws and regulations governing the forestry sector in Liberia are:

TABLE 33: FORESTRY SECTOR LEGAL FRAMEWORK

Legislation	Description
Policies	
<u>National Forest Management Strategy (2007)</u>	This policy framework lays out Liberia's vision and approaches for sustainable forest management. It prescribes clear and measurable goals for how the country's forests should be managed to provide economic, social, and environmental benefits for current and future generations. The strategy emphasizes balancing commercial use with conservation and local livelihoods.
Legislations	
<u>Act for the Conservation of the Forests (1953)</u>	The first forestry law in Liberia, which established the foundation for managing forests and wildlife. It provided for the creation of government reserves, native authority reserves, commercial forests, national parks, and wildlife refuges.
<u>Supplementary Act for the Conservation of Forests (1957)</u>	This act reinforced and expanded the provisions of the 1953 law, strengthening the framework for classifying forests into reserves, commercial forests, and protected areas.
<u>The Forestry Development Authority Act (1976)</u>	<p>The Act created the Forestry Development Authority (FDA) as a statutory body to regulate and oversee forestry in Liberia. Its objectives included establishing a permanent forest estate, practicing scientific forestry, preventing waste and destruction of forest resources, and ensuring profitable yet sustainable harvesting of timber and other forest products, while aligning forestry with other land uses.</p> <p>Further Amendments have been enacted to even improve the governance and ownership responsibility of the FDA in forest management in Liberia. For instance, the National Forestry Reform Law further enjoins the FDA with the responsibility to assure the sustainable management of the Republic's Forest Land, conservation of the Republic's Forest Resources, protection of the Republic's Environment, and sustainable development of the Republic's economy, with the participation of and for the benefit of all Liberians, and to contribute to poverty alleviation in the Nation.</p>
<u>The 2006 National Forestry Reform Law (NFRL 2006)</u>	The Law provides the principal legal framework for managing Liberia's forests. It defines ownership and user rights, regulates the allocation and use of forest resources, and establishes rules for commercial operations, environmental protection, and wildlife conservation. The law also governs trade in forest products, introduces transparent procedures for granting forest concessions, and requires benefit-sharing with local communities. By replacing outdated provisions of earlier legislation, it reorients Liberia's forestry sector toward sustainability, accountability, and broad-based participation.
<u>Community Rights Law with respect to forest lands (2009)</u>	This law empowers local communities by granting them legal rights to manage and benefit from forest resources within their territories. It establishes Community Forest Management Agreements (CFMAs), providing a legal framework for community participation in forest governance, with the aim of reducing poverty and promoting inclusive forest management.
<u>Wildlife and National Parks Act (1988)</u>	This Law identifies several protected areas and specifies policies and objectives regarding wildlife and conservation in Liberia.

Legislation	Description
<u>National Wildlife Law (2016)</u>	This law provides a modern framework for conserving Liberia's wildlife and habitats, regulating hunting and trade, protecting endangered species, and promoting community participation in conservation. It aligns national wildlife management with international standards.
<u>Environmental Protection and Management Law (EPML - 2002)</u>	The EPML provides the legal framework for the sustainable development, management and protection of the environment by the EPA. It works in collaboration with regulatory ministries and organizations in Liberia. The law provides detailed information and guidance on the state of the environment and for things connected therewith. Section 77 and 78 focus on protection of the forest and reforestation, respectively.
<u>Land Rights Act (2018)</u>	The Act with respect to forest lands gives statutory recognition to customary ownership of both forests and forest resources within community lands, provides for the management of community forests by community forest management bodies, and requires prior informed consent of the community for concessions to be made on community lands. It further provides the legal basis for the formation of community owned governance structures to manage customary and community owned lands and forest resources.
Regulations	
<u>Code of Forest Harvesting Practices (2007)</u>	The Code of Forest Harvesting Practices is a mandatory technical standard issued by the Forestry Development Authority (FDA). It sets out clear guidelines for sustainable timber harvesting, including reduced impact logging, environmental protection, road construction, and worker safety. While not primary legislation, compliance with the Code is legally required under Liberia's forestry regulatory framework.
<u>Ten Core FDA Regulations</u>	<p>A suite of regulations issued under the 2006 Reform Law to operationalize its provisions. They include:</p> <ul style="list-style-type: none"> - Regulation on Public Participation in Promulgation of Regulations, Codes, and Manuals (FDA Regulation 101-07). - Regulation on Forest Land Use Planning (FDA Regulation 102-07). - Regulation on Bidder Qualifications (FDA Regulation 103-07). - Regulation on Tender, Award, and Administration of Forest Management Contracts, Timber Sale Contracts, and Major Forest Use Permits (FDA Regulation 104-07). - Regulation on Major Pre-Felling Operations under Forest Resources Licenses (FDA Regulation 105-07). - Regulation on Benefit Sharing (FDA Regulation 106-07). - Regulation on Certain Forest Fees (FDA Regulation 107-07). - Regulation on Establishing a Chain of Custody System (FDA Regulation 108-07). - Regulation on Penalties (FDA Regulation 109-07). - Regulation on Rights of Private Landowners (FDA Regulation 110-07).
International Agreements	
<u>Voluntary Partnership Agreement (2011)</u>	A legally binding agreement under the European Union Forest Law Enforcement, Governance and Trade (FLEGT) Action Plan, which combats illegal logging, strengthens forest governance, and promotes trade in legally harvested timber. Requires Liberia to verify timber legality through a Legality Assurance System (LAS), enhancing transparency, law enforcement, and stakeholder participation. Implemented via Liberia's forestry laws and FDA regulations.

4.2.3.(b) Institutional framework of the forestry sector

The main structures involved in the forestry sector as well as their main roles and responsibilities are summarized in the table below:

TABLE 34: FORESTRY SECTOR INSTITUTIONAL FRAMEWORK

Institution	Description of Roles and Responsibilities
<u>The Forestry Development Authority (FDA)</u>	<p>The FDA is a semi-autonomous public corporation established by an Act of the Legislature on 20 December 1976. Its mandate is to sustainably manage and conserve Liberia's forests and related resources for the benefit of present and future generations.</p> <p>Key responsibilities include:</p> <ul style="list-style-type: none"> - formulating and enforcing forestry laws, policies, and regulations in collaboration with relevant ministries and agencies; - promoting sustainable management, conservation, and utilization of forest resources, considering environmental, social, and economic benefits; - regulating, monitoring, and supervising concession operations to ensure compliance with guidelines; - assessing, collecting, and managing revenue from forestry activities; - conducting forestry research, training, and providing technical assistance to sector operators; - implementing and supervising reforestation programs and projects; - engaging rural communities in forestry programs and promoting local participation; and - providing protection and extension services to sustain the forest estate. <p>The FDA applies a "3 C's - Commercial, Community, Conservation" approach to balance economic development, community engagement, and environmental protection in Liberia's forest management.</p>
<u>Environmental Protection Agency (EPA)</u>	<p>The EPA is Liberia's principal environmental authority, mandated to coordinate, monitor, and supervise all activities affecting the environment and to ensure the sustainable use of natural resources.</p> <p>Key responsibilities include:</p> <ul style="list-style-type: none"> - overseeing compliance with environmental regulations across sectors, including forestry; - coordinating with stakeholders and government agencies on environmental planning and management; and - facilitating Liberia's participation in international environmental conventions and agreements.
<u>Ministry of Internal Affairs</u>	<p>The Ministry oversees governance and administration within local and urban areas.</p> <p>Key responsibilities include:</p> <ul style="list-style-type: none"> - custodianship of public and private property within Liberia's territory; - coordinating community engagement in forest management and land governance; and - overseeing the implementation of community rights, including Community Forest Management Agreements (CFMAs).
<u>Liberia Institute of Statistics and Geo-Information Services (LISGIS)</u>	<p>LISGIS provides data and mapping services essential for forest management, land use planning, and environmental monitoring.</p> <p>Key responsibilities include:</p> <ul style="list-style-type: none"> - producing geospatial data for forest mapping and monitoring; and

Institution	Description of Roles and Responsibilities
	<ul style="list-style-type: none"> - supporting the FDA and EPA in sustainable resource management and planning.
Ministry of Finance and Development Planning (MFDP)	<p>Responsible for financing and economic oversight of forestry activities.</p> <p>Key responsibilities include:</p> <ul style="list-style-type: none"> - managing the collection of revenue from forestry operations; - allocating budgets for forestry projects, research, and community programs; and - monitoring financial compliance of concessionaires.
Liberia Revenue Authority (LRA)	<p>Responsible for assessing and collecting taxes and fees from forestry operations, including timber exports.</p> <p>Key responsibilities include:</p> <ul style="list-style-type: none"> - ensuring proper revenue collection from forestry concessions; and - monitoring compliance with fiscal obligations by forestry companies.

4.2.3.(c) Fiscal regime of the forestry sector

The key legal frameworks providing for the forestry sector's fiscal regime in Liberia are:

- [Revenue Code of Liberia \(2000\) and as Amended in 2011](#);
- [The National Forestry Reform Law \(NFRL\) of 2006](#); and
- [The Ten Core FDA Regulations](#).

The fiscal regime for the forestry sector in Liberia includes the following:

TABLE 35: MAIN PAYMENT STREAMS IN THE FORESTRY SECTOR

Tax	Description
Corporate Income Tax	<p>All holders of Forest Resources Licenses are subject to the revenue and finance laws of general application in the Republic.</p> <p>Rate: 25% based on net income.</p>
Stumpage fees	<p>Stumpage fees are fees associated with the harvest of Forest Resources, including fees based on the kind and amount of Forest Resources harvested.</p> <p>Any person felling a tree shall pay to the Government a log stumpage fee, based on the merchantable volume harvested, according to the following formula:</p> <ol style="list-style-type: none"> 1) For category A species, 10% of the market price of Log, FOB Monrovia, as determined in the list approved under Section 3 of FDA Ten Core regulations; 2) For category B species, 5% of the market price of Log, FOB Monrovia, as determined in the list approved under Section 3 of FDA Ten Core regulations; and 3) For category C species, 2.5% of market price of Log, FOB Monrovia, as determined in the list approved under Section 3 of FDA Ten Core regulations.
Land rental fees	Land rental fees, which are fees associated with the use of Forest Land, including administrative fees and area-based fees tied to Forest Resources Licenses.
Forest Product fees	Forest Product fees, which are fees associated with the production, registration, transport, transfer of ownership, use, or export of Forest Products.
Log Export Fees	These are fees associated with the export of logs as a forestry product.
FDA coupe annual inspection fees	US\$ 50 per square kilometer block.

4.2.4. Legal framework of the agriculture sector

4.2.4.(a) Legislation governing the agriculture sector

As per the reporting scope, the agriculture sector comprises the oil palm and rubber subsectors. Some of the key pieces of legislation that guide the agriculture sector include:

TABLE 36: AGRICULTURE SECTOR LEGAL FRAMEWORK

Legislation	Description
<u>Agricultural Law 1973</u>	<p>This foundational law regulates the administration and development of Liberia's agricultural sector. It is divided into four chapters:</p> <ul style="list-style-type: none"> - Chapter 1: Establishes the short title, purpose, definitions, authority and responsibilities of the Minister of Agriculture, and penalties for violations. - Chapter 2: Establishes the National Livestock Bureau to coordinate and administer the development of animal husbandry, including provisions for a national artificial insemination program. - Chapter 3: Prohibits the destruction of palm trees on public lands. - Chapter 4: Requires the erection of boundary posts on farmlands and establishes the Annual National Agricultural and Commercial Fair.
<u>Liberia Agriculture Commodity Regulatory Authority Act (2014)</u>	<p>This Act establishes the Liberia Agricultural Commodities Regulatory Authority (LACRA) as a semi-autonomous body under the Ministry of Agriculture.</p> <p>Governed by a Board of Directors, with a Director General managing day-to-day operations, the Authority is responsible for promoting Liberia's agricultural export trade, improving productivity and competitiveness, supporting value chain development, and ensuring environmental sustainability, particularly for smallholders, women, and youth. LACRA also licenses exporters and serves as an advisory and dispute resolution body.</p>
<u>Rubber Development Fund Incorporated Act (2016)</u>	<p>This Act provides the framework to ensure the development and modernization of Liberia's Rubber Industry in all aspects, including capacity building and manufacturing of rubber products as well as improving the performance and competitiveness of Liberian Rubber supply chain and value chain activities. The enactment of this law led to the repeal and replacement of the Rubber Industry Rehabilitation and Development Fund of Liberia (2003) and the Liberia Rubber Development Authority Act (2004).</p>
<u>Revenue Code of Liberia (2000) and as Amended in 2011</u>	<p>The Law stipulates determinative legal provisions for agriculture and renewable resources taxation in Liberia. Specifically, Sections 600 to 623 covers overall taxation in the sector, including the definition of key agriculture and renewable resources taxation terms, rate of tax, valuation, surface rents and royalties, determination of taxable income from renewable resources project, and other tax related structures.</p>
<u>Land Rights Act (2018)</u>	<p>The Law provides a framework for the legal definition of land ownership, use, and overall administration, including dispute resolution and transfer of land ownership. Specifically, it prescribes means by which each land category in Liberia can be acquired, used, transferred, or otherwise managed.</p>
<u>Environmental Protection and Management Law (EPML - 2002)</u>	<p>Establishes the legal framework for environmental governance and protection under the Environmental Protection Agency (EPA).</p> <ul style="list-style-type: none"> - Requires Environmental Impact Assessments (EIAs) for agricultural activities. - Provides guidelines for sustainable management of natural resources and coordination with relevant ministries, agencies, and communities.

4.2.4.(b) Institutional framework of the agriculture sector

The main structures involved in the agriculture sector as well as their main roles and responsibilities are summarized in the below table:

TABLE 37: AGRICULTURE SECTOR INSTITUTIONAL FRAMEWORK

Institution	Description of Roles and Responsibilities
<u>Ministry of Agriculture (MoA)</u>	<p>The Ministry of Agriculture is mandated to develop Liberia's agricultural sector by establishing an effective organizational structure staffed with personnel capable of planning, coordinating, implementing, monitoring, and evaluating agricultural development programs. Key responsibilities include:</p> <ul style="list-style-type: none"> - training staff and farmers to address challenges in agricultural development. - identifying and resolving obstacles that impede production and providing farmers with support services and a conducive production environment. - overseeing agriculture across smallholder and commercial farming, plantation crops, fisheries, and livestock. - coordinating activities through four main departments: Administration; Planning and Development; Regional Development and Extension; and Technical Services, each comprising specialized units and divisions.
<u>Liberia Agriculture Commodity Regulatory Authority (LACRA)</u>	<p>The LACRA is a semi-autonomous agency of the Government created by an act of the legislature in 2014. The mission of LACRA is to further enhance the Country's agriculture potential by promoting, developing standards, and regulating agriculture exports through:</p> <ul style="list-style-type: none"> - product quality improvement traceability to maintain the national integrity of the country from farm gate to market; - the establishment of a rigorous commodity trade licensing regime, including inspection and validation of storage; - commodity price standardization based on world market variables to ensure the receipt of a fair share of the world market price; and - international connectivity maintain with the country's regional and international partners, including the Inter-African Coffee Organization, the International Cocoa Organization, the International Coffee Organization, etc.
<u>Central Agricultural Research Institution (CARI)</u>	<p>Responsible for agricultural research and innovation to improve productivity and sustainability. Key responsibilities include:</p> <ul style="list-style-type: none"> - improving product quality and traceability from farm gate to market to maintain national integrity; - administering a robust commodity trade licensing system, including inspection and storage validation; - standardizing commodity prices based on global market trends to ensure fair market returns; and - facilitating international engagement with regional and global partners, including the Inter-African Coffee Organization, International Cocoa Organization, and International Coffee Organization.
<u>Rubber Development Fund (RDF)</u>	<p>Established under the Rubber Development Fund Incorporated Act (2016) to support the growth and modernization of Liberia's rubber industry. Key responsibilities include:</p> <ul style="list-style-type: none"> - capacity building and technical support for rubber farmers; - enhancing manufacturing, supply chain efficiency, and competitiveness of Liberian rubber; and - coordinating with government and private sector stakeholders to promote sustainable industry growth.

Institution	Description of Roles and Responsibilities
Environmental Protection Agency (EPA)	Plays a cross-sectoral role in agriculture by ensuring sustainable land and natural resource use. Key responsibilities includes: <ul style="list-style-type: none"> - conducting Environmental Impact Assessments (EIAs) for agricultural projects; - monitoring compliance with environmental regulations; and - promoting sustainable practices that minimize deforestation, soil degradation, and water pollution.
Ministry of Finance and Development Planning (MFDP)	The MFDP oversees the financial and economic aspects of Liberia's agriculture sector. Key responsibilities include: <ul style="list-style-type: none"> - allocating budgets and resources for agricultural programs, research, and rural development; - monitoring financial performance and ensuring efficient use of government funds in agriculture projects; and - supporting economic policies that promote sustainable growth in agriculture.
Liberia Revenue Authority (LRA)	The LRA is responsible for assessing and collecting taxes and levies from agricultural activities and businesses Key responsibilities include: <ul style="list-style-type: none"> - collecting taxes, fees, and royalties from agricultural producers, exporters, and agribusinesses; - ensuring compliance with fiscal obligations across the agriculture sector; and - supporting revenue generation to fund government agricultural programs and infrastructure.

4.2.4.(c) Fiscal regime of the agriculture sector

The agriculture sector fiscal regime is set out in chapter 6 of the LRC (2000) and as Amended in 2011.

The main revenue streams paid by agricultural companies in Liberia are:

TABLE 38: MAIN PAYMENT STREAMS IN THE AGRICULTURE SECTOR

Tax	Description
Corporate Income Tax	Income tax is imposed on taxable income from agricultural production and renewable resource projects. The tax rate on taxable income from extraction of renewable resources, except for rice production project, shall be 25%. The rate of tax on taxable income for rice production projects shall be 15%.
Surface Rental	A contractor must pay an annual surface rent of US\$ 2 per acre for developed land and US\$ 1 per acre for undeveloped land, irrespective of the value of the assets contained thereon. The valuation of and the payment for the value of the assets in a proposed concession area may be made a biddable item in the concession procurement process. Annual payments are due on or before the effective date of the agreement and thereafter on the agreement anniversary date.
Royalty for Carbon Credits	A contractor who has entered into a renewable resource contract and who obtains carbon credits must pay a carbon credit royalty equal to 10% of the value of the credits.

4.3. Contract and license allocations

4.3.1. License allocations in the Mining Sector

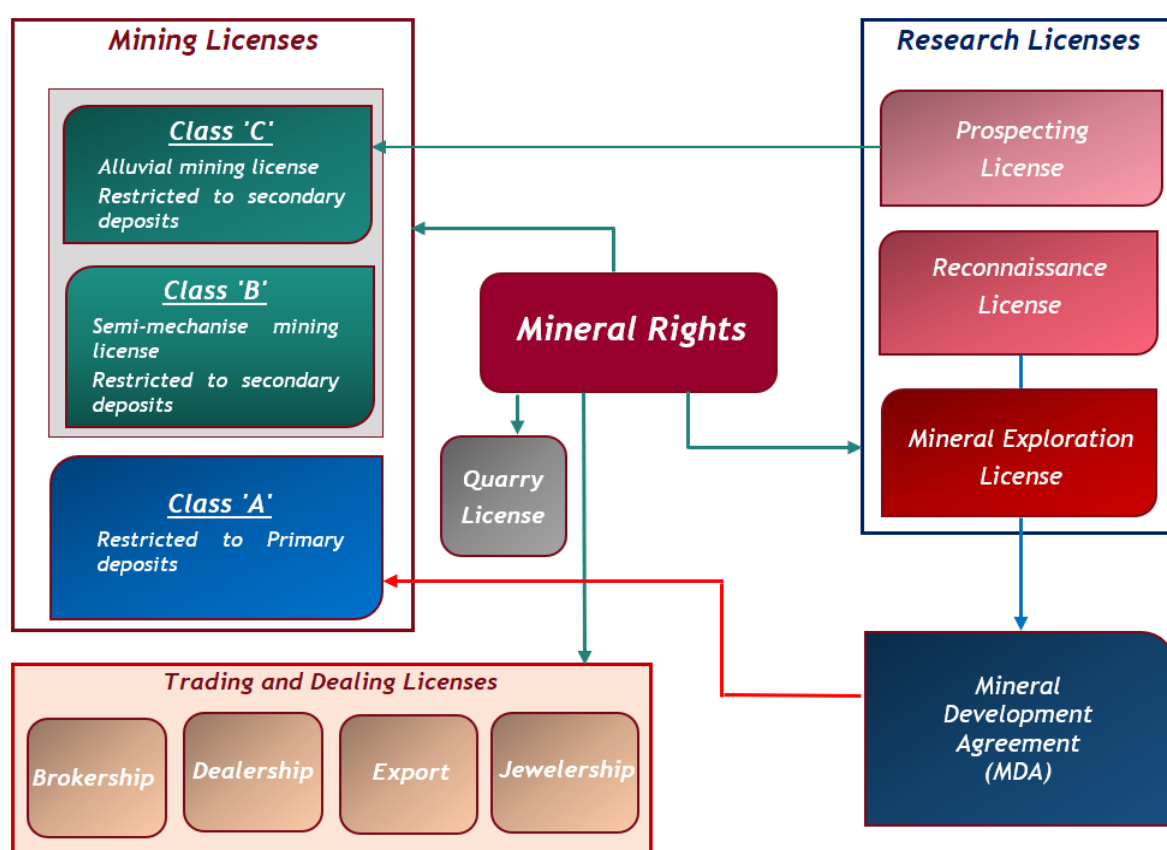
4.3.1.(a) Types of mining licenses and permits

The license award process in the mining sector is regulated by the Minerals and Mining Law (2000), under Chapters 5, 6, and 7. Liberia practices an open door negotiated system for allocating mineral rights on a first-come-first-serve basis. The types of licenses include Reconnaissance, Prospecting, Exploration and Mining Licenses. There are different classes of mineral licenses including Class A, B, and C.

The Law also allowed the government to enter into a Mineral Development Agreement (MDA) with any eligible applicant. Eligible Applicants shall have concluded an MDA or other agreement with the government to be granted either an Exploration License or a Class A Mining License.

In the figure⁴⁵ below are presented the different mineral rights that were granted according to the Minerals and Mining Law, 2000:

FIGURE 15: MINERAL RIGHTS IN LIBERIA



The table below details the rights conferred and requirements for application of each class of mineral license related to upstream activities:

⁴⁵ <https://mme.gov.lr/basic-mineral-titles/>

TABLE 39: DESCRIPTION AND REQUIREMENTS OF MINERAL LICENSES RELATED TO UPSTREAM ACTIVITIES

Type	Rights conferred and requirements	Area	Duration
Research Licenses			
Reconnaissance License	<p>The holder of a Reconnaissance License shall have the rights during its term, to conduct reconnaissance in the area subject to the Reconnaissance License.</p> <p>The holder shall not engage in drilling or sinking of pits.</p>	Not exceeding 2,000 square km.	Maximum period of six months, renewable once for another six months.
Prospecting License	<p>The holder of the Prospecting License shall have the exclusive rights during its term to conduct Prospecting over the granted area and to apply for a Class B or Class C Mining License with respect to any part of the granted area.</p> <p>The holder shall file and submit to the Minister a proposed work plan for prospecting.</p>	Not exceed 100 acres.	Period of six months, renewable once for a further period of six months.
Exploration License	<p>The holder of the Exploration License shall have the exclusive rights to conduct Exploration work in the area granted and covered under the terms of the Exploration License.</p> <p>The holder shall submit a proposed exploration program to the Minister within 90 days after the issuance of the Exploration License.</p>	1,000 square km.	Three years and it may be extended for a single two-year term.
Mining Licenses			
Class A Mining License	<p>It is granted during or at the end of the exploration period of a discovery of exploitable deposits and is materially in compliance with, an MDA, which has become effective, permitting mining in the proposed production area (Large-scale operations).</p> <p>The operator shall have successfully completed a proposed exploration program and submitted to the Minister a detailed map and descriptive statement based on actual surveys.</p> <p>the operator shall have completed a feasibility report describing a plan for the efficient and economic conduct of Mining in the Proposed Production Area.</p>	As mapped	25 years, renewable by additional 25 years.
Class B Mining License	<p>The holder of a Class B Mining License shall have the right to conduct mining as an industrial operation.</p> <p>The holder shall submit a production plan to the Ministry prior to commencing Mining.</p>	An area not currently under a mineral right	Five (5) years, renewable by additional five (5) years.
Class C Mining License	<p>The holder of a Class C Mining License shall have exclusive rights to mine in the Production Area covered by the mining license.</p> <p>The holder shall conduct mining predominantly as a Small-Scale Operation.</p>	Up to 25 acres	One year, renewable for further terms of one year each.

Type	Rights conferred and requirements	Area	Duration
Quarry License	<p>The holder of a Quarry License shall have the exclusive rights to develop, Mine, and sell Building and Industrial Minerals found within the area subject to the Quarry License but shall not have the right to Mine other Minerals.</p> <p>The Quarry License is granted on the same basis as a Class B Mining License. The only exception is that the area must not exceed 50 acres.</p>	Up to 50 acres	Five 5 years, renewable for further terms of five years each.

Source: Minerals and Mining Law, 2000.

4.3.1.(b) Awarding procedures for mining licenses and permits

All persons or operators desiring to participate in the mineral sector of Liberia are required to be licensed before they can engage in the mining activities.

We present below the licensing application process of each class of mineral license and agreements related to upstream activities.

Application process for exploration, prospective and reconnaissance licenses

The table below provides details of the application process for Exploration, Prospective and Reconnaissance Licenses:

TABLE 40: APPLICATION PROCESS FOR EXPLORATION, PROSPECTIVE AND RECONNAISSANCE LICENSES

Step	Stage/Activity
1	Applicant submits application at the Minister's office.
2	Minister's office logs and stamps application with a date and time application received.
3	Minister's office sends application to Cadastre Unit for Registration. Registrar inputs application data and coordinates on MCAS, scans application into shared folders and uploads application into MCAS.
4	Application in Validation stage, whereby the Geographic information systems (GIS) Technician within Cadastre Unit verifies area limit, application requirements and whether area is encumbered by other licenses, concessions, protected, proposed protected, conservation as well as proposed conservation areas.
5	GIS Technician prepares a map of the application area with comments and forwards application and map to the Director of the Mining Cadastre Information Management Unit (MCIMU).
6	Director of MCIMU reviews application, adds comments on application and map and sends them to the Assistant Minister for Exploration (AME).
7	AME office send application to Liberian Geological Survey (LGS) for, compliance check including timely submission of reports and execution of the license work program and other legal and regulatory obligation of the license.
8	LGS recommends either the granting or denial of application based on its review and forwards application to AME.
9	If LGS recommends that application be granted, the AME makes comments, signs application and sends it to Cadastre Unit to print an Order to Pay (OTP) for surface rent and license fee.
10	Registrar calculates surface rent and license fees (exploration license), prints out an OTP and Cadastre Unit forwards OTP to AME for signature and approval by the Deputy Minister for Exploration.

Step	Stage/Activity
11	OTP is returned to the Cadastre Unit and issued to the applicant for payment.
12	Applicants pay necessary fees and return payment receipts to the Cadastre Unit.
13	Registrars record payment data into MCAS and print license.
14	License is sent to AME for signature and approval by the Minister (Exploration and Reconnaissance only. Prospecting license is signed by the Director of LGS and approved by the AME).
15	Signed License is returned to the Cadastre Unit.
16	License is scanned and attached to the shared folder.
17	Director of Cadastre contacts applicant to pick up license from the Cadastre Unit.

Source: Ministry of Mines and Energy (MME)

Application process for Class B and C Mining Licenses

Eligible Applicants for a Class B or Class C Mining Licenses may apply for, and the Minister shall grant, a Class B or C Mining Licenses over a production Area not subject to a Mineral Right granted another Person subject.

The table below provides details of the application process for Class B and C mining Licenses:

TABLE 41: APPLICATION PROCESS FOR CLASS B AND C MINING LICENSES

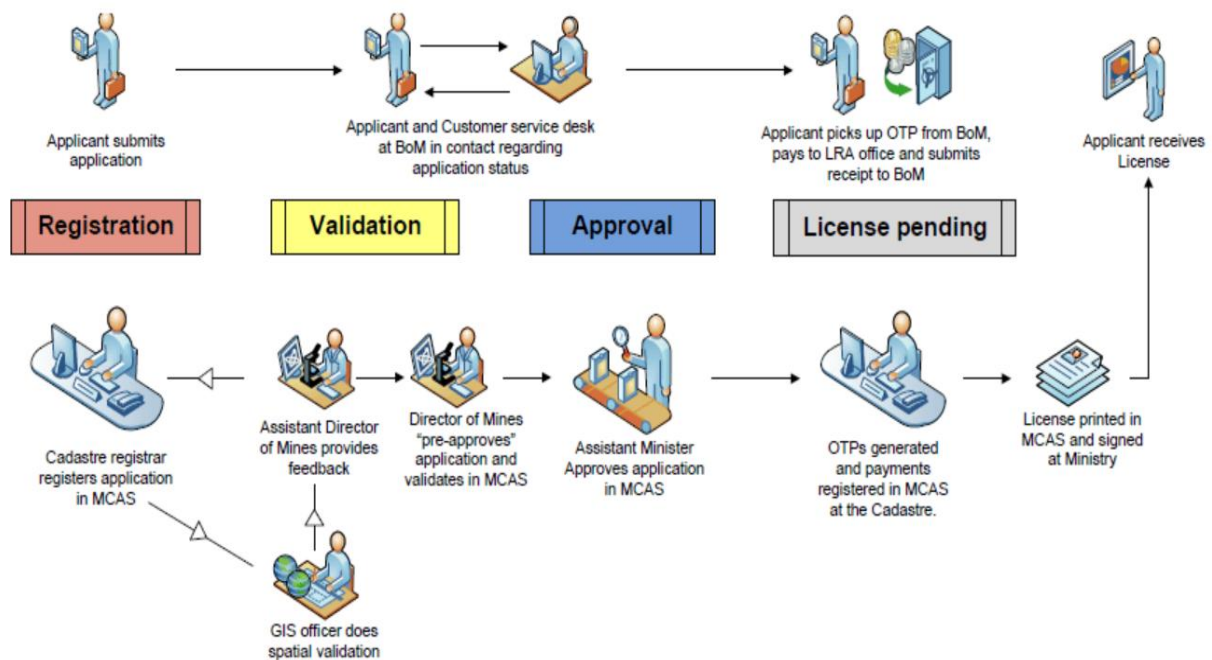
Step	Stage/Activity
1	Application submitted to Minister's office.
2	Application recorded by Cadastre office and uploaded on MCAS.
3	Vetting of application by GIS technician and recommendation for validation.
4	Application forwarded to bureau of Mines for further vetting.
5	Application reviewed, vetted, and validated by Director of Mines.
6	Assistant Minister of Mines reviews and issues approval.
7	Application is forwarded by Bureau of Mines to Cadastre office to effect payment process.
8	Request for Payment delivered to applicant.
9	Payment made to LRA by applicant and receipt submitted to Bureau of Mines.
10	Cadastre receives payment confirmation and prints license and sends it to Bureau of Mines for signing.
11	License is issued to applicant.
12	License filed and included in Cadastre.

Source: Ministry of Mines and Energy (MME)

The figure below shows the application workflow for Class B and C Mining Licenses.⁴⁶

⁴⁶ Source: Ministry of Mines and Energy (MME)

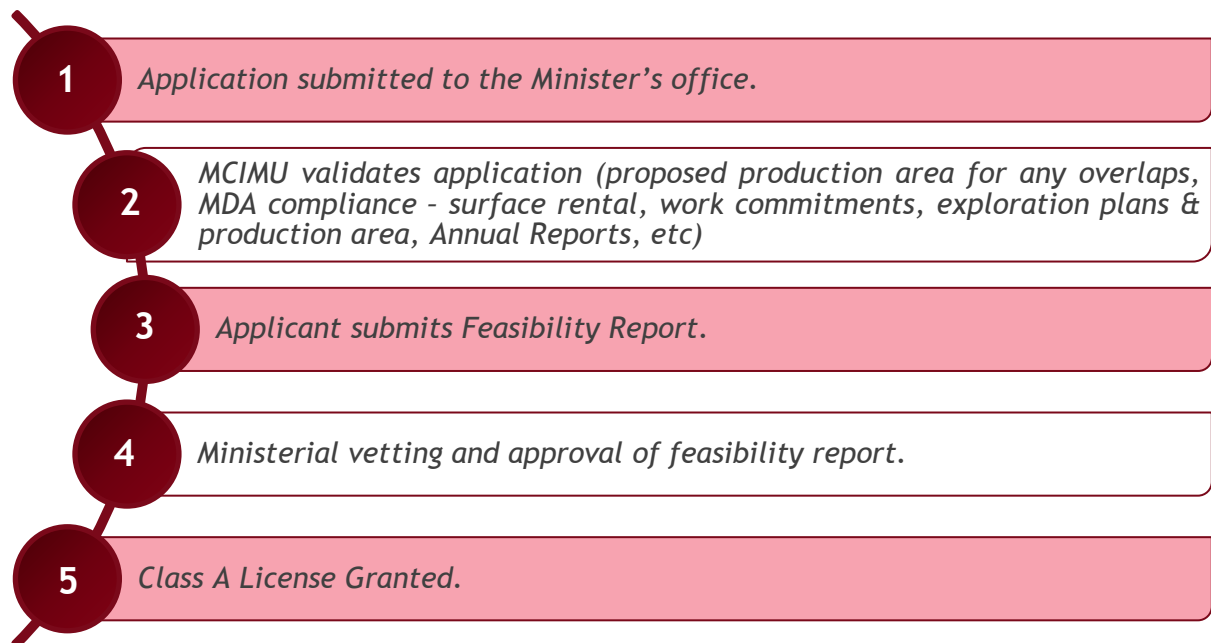
FIGURE 16: APPLICATION WORKFLOW FOR CLASS B AND C MINING LICENSES



Application process for Class A Mining Licenses

The figure below provides details for each step of the application process for Class A mining License:⁴⁷

FIGURE 17: APPLICATION PROCESS FOR CLASS A MINING LICENSE



⁴⁷ Source: Ministry of Mines and Energy (MME)

Application process for a Mineral Development Agreement (MDA)

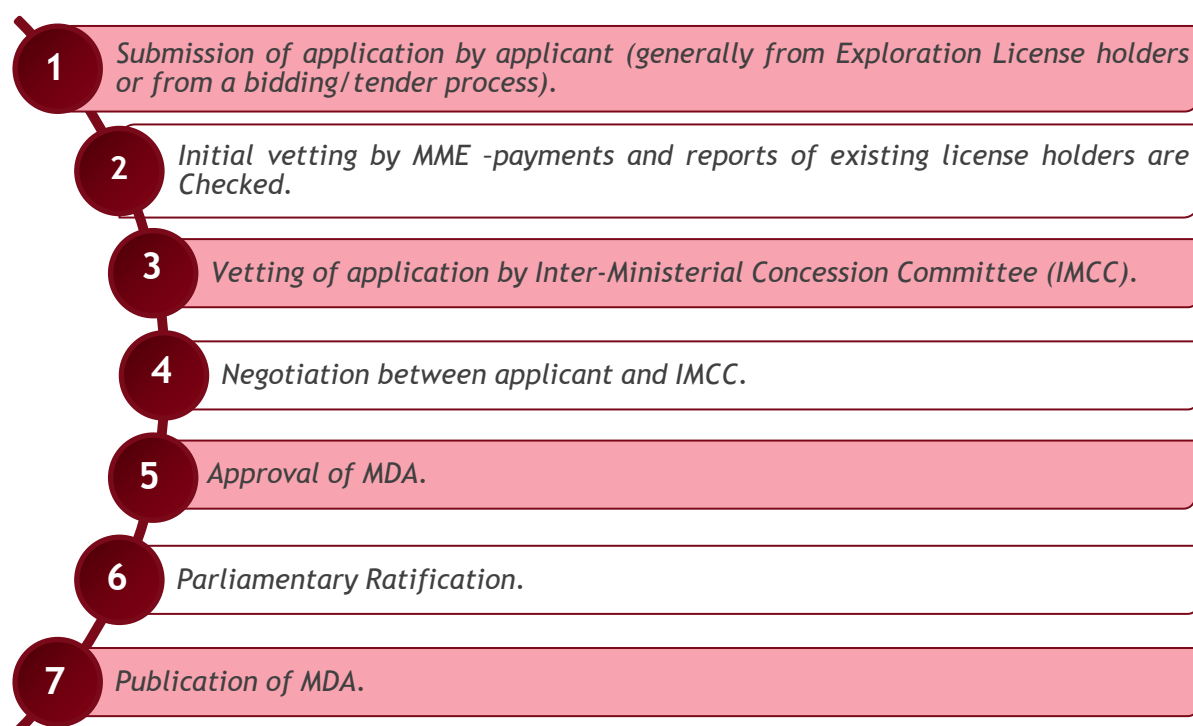
The MDAs are legally binding agreements between mining companies and the Government of Liberia. Eligible applicants shall have concluded an MDA or other agreement with the Government to be granted either an Exploration License or a Class A Mining License.

MDAs must follow the main following rules:

- exploration and production work programs;
- environmental protection and management;
- fiscal and tax obligations;
- financial reporting;
- terms guaranteeing the right of the other party will be free from currency of other exchange controls with respect to their proceeds of export sales, to repatriate earnings, and to exchange currency in Liberia at fair market rates of exchange; and
- terms providing for international binding arbitration of disputes arising, terms affirming such party's right to import goods and equipment for use in its operations and to export Minerals.

The figure below provides details for each step of the application process for an MDA:⁴⁸

FIGURE 18: APPLICATION PROCESS FOR A MINERAL DEVELOPMENT AGREEMENT



⁴⁸ Source: Ministry of Mines and Energy (MME)

Technical and Financial Criteria used in Mineral License Allocation

The MME is mandated by act of the Minerals and Mining Law, 2000 to ensure that any potential investor or applicant who expresses interest in the exploitation of the Liberia's minerals resources possesses the requisite technical and financial capacity to meet legal obligations under all mineral licenses or agreements.

Section 6.5 of the Minerals and Mining Law, 2000 regarding the process for granting of Class A Mining License stipulates that “the Minister shall have been satisfied that the operator possesses the necessary technical skill and experience, and the financial resources necessary, to allow it to carry out Mining Operations in keeping with the requirements of a Class A Mining License and of this Law”.

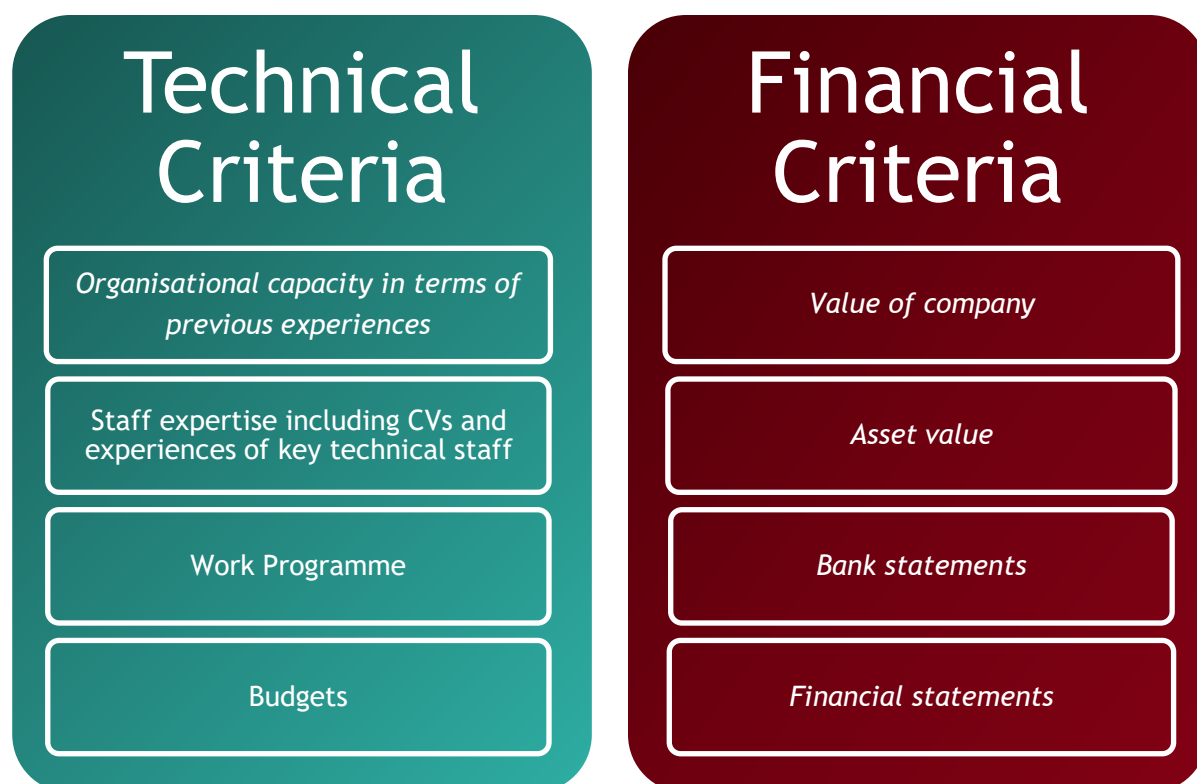
The Law defines an eligible applicant as: “... shall mean the person eligible to receive the Mineral Right of the type applied for, pursuant to the provisions of Section 4.2 of this Law and who has demonstrated the technical and financial capacity required with respect to that Mineral Right”.

Section 4.2 requires the demonstration of both financial and technical capacity of the licensee. This section stipulates that information furnished by the Licensee demonstrates to the reasonable satisfaction of the Minister that:

- in accordance with Schedule 4.2(c)(i) “*The Licensee must demonstrate that it possesses, or is able to outsource, the technical resources to conduct the proposed work program. These technical resources must include registered professionals with experience in the specific field of prospecting for the minerals covered by the relevant licensee. Evidence of the qualifications of third parties should come directly from them or from reliable external sources which are identified. The licensee must also show evidence of the availability on the schedule provided in the proposed work program of the equipment required to carry out the proposed work program, whether to be provided by the licensee or to be provided by third parties*”.
- in accordance with Schedule 4.2(c)(ii) “The licensee must provide a financial plan indicating the manner in which its proposed work program and budget will be funded. To the extent funding is to come from the owners of the licensee, audited financial statements and estimated free cash flow projections of such persons should be provided. To the extent funding is to come from other sources, the nature of the sources should be described, and the licensee must provide a letter from an investment bank or similar firm experienced in the funding of mining exploration companies to the effect that the financing plan is a practical plan that could reasonably be expected to be implemented under the circumstances existing as at the date of such letter”.

We present in the figure below the technical and financial criteria used in practice for assessing license application:

FIGURE 19: TECHNICAL AND FINANCIAL CRITERIA FOR ASSESSING MINING LICENSES APPLICATION



Mineral License Transfer Process

Section 9.17 of the Minerals and Mining Act (2000) stipulates that mineral rights may be assigned only upon the approval of the government, except for an assignment to an affiliate of the Holder of Mineral Rights. Any purported assignment in contravention of this section shall be null and void and shall constitute a material violation of the Law.

Section 15.1 of the Regulations governing exploration under a mineral exploration license (2010) stipulates that no Transfer of a License is permitted unless it has received the prior written consent of the Minister or is otherwise permitted under the terms of Section 15.2, 15.3 or 15.6 of the Regulations governing exploration under a mineral exploration license (2010).

Section 15.5 (c) of the Regulations governing exploration under a mineral exploration license (2010) prescribes that the transferee should demonstrate to the reasonable satisfaction of the Minister prior to the occurrence of such transfer that:

- it possesses, or has access to, the technical capacity as contemplated by Schedule 4.2(c)(i) to carry out its approved work program and comply with its obligations under this regulation and the Mining Law; and
- it has the financial capacity as contemplated by Schedule 4.2(c)(ii) to carry out its approved work program and comply with its obligations under this regulation and the Mining Law.

4.3.1.(c) Mining licenses awarded and transferred during the reporting period

During FY 2023, there were 528 licenses awarded as detailed in the table below:

TABLE 42: MINING LICENSES AWARDED DURING THE REPORTING PERIOD

Licenses awarded during the reporting period	Number
Class C Mining License	377
Class B Mining License	22
Class A Mining License	0
Exploration License	48
Reconnaissance License	2
Prospecting license	79
Total	528

Source: Ministry of Mines and Energy (MME)

The list of licenses granted during the FY 2023, is included in Annex 1 to this report.

4.3.1.(d) Review of the mining licenses awarding process during the reporting period

We have selected the following licenses from the list of licenses awarded during 2023 to be verified for material deviations from the applicable legal and regulatory framework governing license transfers and awards. The table below presents the sample selected based on randomly generated options from the list of licenses provided by the MME. The MSG members are invited to select other licenses should the need arise.

TABLE 43: LIST OF MINING LICENSES SELECTED FOR REVIEW

Application type	Mining Company	License code	License start date	License expiry date	Commodity
Exploration license	Arcelor Mittal Liberia Holdings Limited	MEL8000623	04/09/2023	03/09/2025	Iron ore
Prospecting license	Maryland Oil & Gas Services	PL10035823	20/12/2023	19/06/2024	Gold
Reconnaissance license	Next Generation Resources Inc.	MRL9000923	20/02/2023	19/08/2023	Base metals

In order to check for any material deviations from the applicable legal and regulatory frameworks governing the award of mining licenses, we requested the following documents from the MME:

TABLE 44: REQUESTED DOCUMENTS FROM MME FOR MINING LICENSE APPLICATION PROCESS

No.	Document
1	Application to the Minister's office.
2	Minister's office logs and stamps application with a date and time application received.
3	Uploaded application into MCAS.
4	Map of the application area with comments.
5	Comments of the Director of MCIMU on the application.
6	LGS recommendations.

No.	Document
7	Signed application.
8	Signed and approved Order To Pay.
9	Validated payment receipt.
10	Signed License.

The IA review was performed in August 2025 at the MME premises. The required documents for the selected sample were checked and no deviations from the applicable legal and regulatory framework were noted.

4.3.2. License allocations in the oil and gas Sector

4.3.2.(a) Types of Oil and Gas Licenses or Agreements

The Liberia Petroleum Regulatory Authority (LPRA) is responsible for granting petroleum rights and negotiating petroleum agreements. The NOCAL manages and markets petroleum data and supports the LPRA in the negotiation of a PSC. NOCAL also represents the Government of Liberia in all PSCs, either through equity participation, direct participation or by operating an entire block.

There are two types of petroleum licenses in the oil and gas upstream sector: the reconnaissance license and petroleum agreements:

TABLE 45: TYPE OF LICENSES AND AGREEMENTS IN THE OIL AND GAS UPSTREAM SECTOR

License Type	Rights conferred
Reconnaissance License	<ul style="list-style-type: none"> - The reconnaissance license shall confer upon the holder non-exclusive and non-transferable rights to conduct reconnaissance operations in an area specified in the license. - Duration is two years.
Petroleum Agreement	<ul style="list-style-type: none"> - Petroleum agreements grant the Contractor, an exclusive right to: <ul style="list-style-type: none"> • explore for petroleum in the contract area and to carry out such operations and execute such works as may be necessary for that purpose; • apply for and obtain an exclusive exploitation authorization, in the event of a discovery of petroleum in the contract areas which following appraisal, has been shown to be commercial; and • to carry out development and production operations in the exploitation perimeter and to transport, sell or otherwise dispose of the contractor's share of petroleum in accordance with the field development and production plan. - A petroleum agreement shall grant the contractor an exploration authorization for a maximum period of seven (7) years, divided into an initial phase, followed by extension periods, which shall be granted to the contractor, at the contractor's request, provided that the exploration work commitment to be carried out in the preceding phase was fulfilled.

License Type	Rights conferred
	- Petroleum agreements shall be in the form of PSC. A model of PSC is publicly available in the NOCAL ⁴⁹ and LPRA ⁵⁰ websites.

Source: Petroleum (Exploration and Production) Reform Law, 2014.

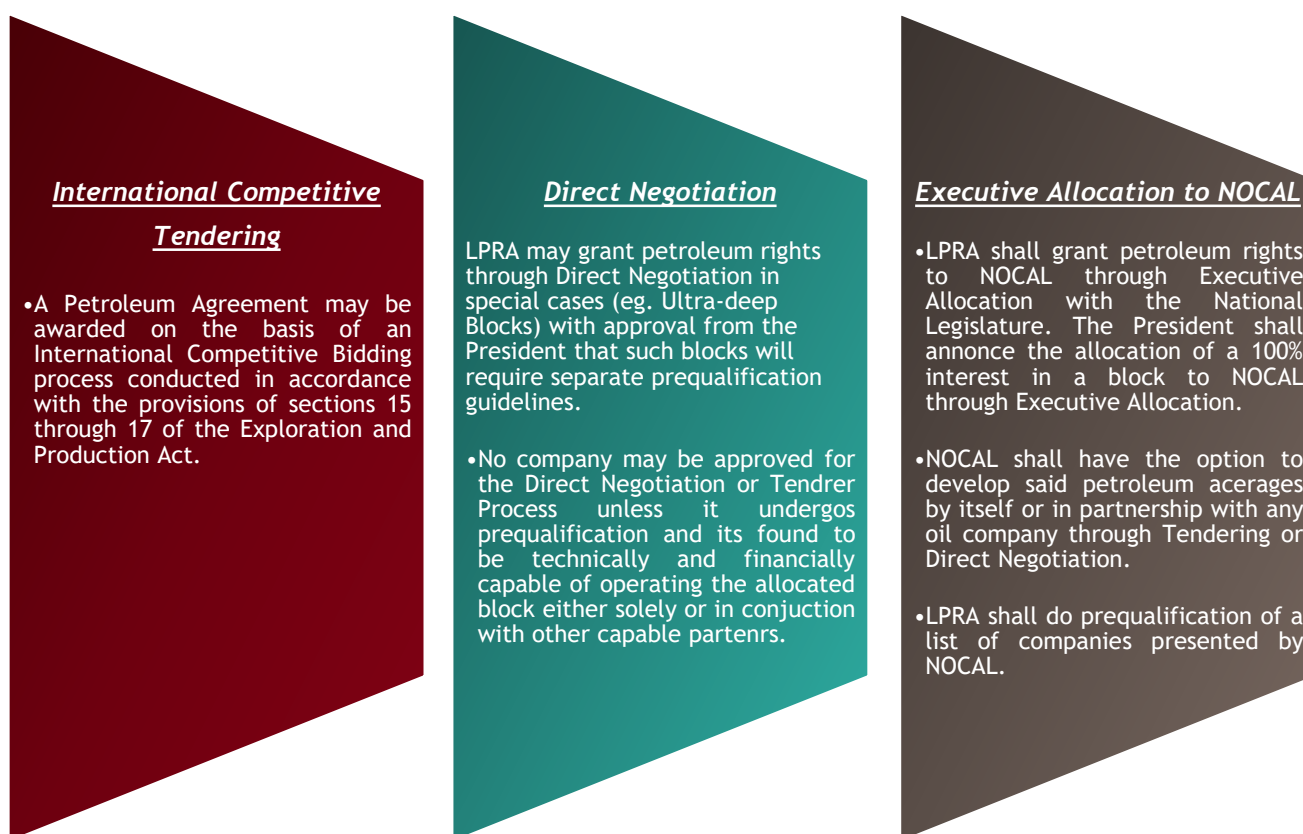
4.3.2.(b) Awarding procedures for Oil and Gas Licenses and Agreements

Processes for awarding Petroleum Rights

The allocation of licensing allocation in the oil and gas sector is regulated by the Petroleum (Exploration and Production) Reform Law (2014) and its amendment (2019). As per Section 14 of the Act, Petroleum rights allocation is done through international competitive tendering, direct negotiation, and executive allocation of rights to NOCAL.

The figure below provides an overview of the different processes for awarding Petroleum Rights:⁵¹

FIGURE 20: PROCESSES FOR AWARDING PETROLEUM RIGHTS



Reconnaissance License application requirements for Onshore Areas

Under the LPRA Regulatory Instrument N°0001/LPRA/19⁵² related to the Reconnaissance License Fees & Application requirements for Onshore Areas:

⁴⁹ <https://www.nocal.com.lr/media/psc>

⁵⁰ <https://lpra.gov.lr/liberia-model-production-sharing-contract-psc/>

⁵¹ Source: Petroleum (Exploration and Production) Amended Law, 2019: https://lpra.gov.lr/wpfd_file/2019-amended-petroleum-law/

⁵² https://lpra.gov.lr/wpfd_file/reconnaissance-license-fees-application-requirements-for-onshore-areas/

- Companies interested in conducting surveys to assess the geological, geophysical, geochemical and geotechnical characteristics of a designated area within Liberia shall apply to the LPRA for a Reconnaissance License.
- The Applicant shall pay a minimum annual fee of US\$ 150,000 to the LPRA in a bank account designated by the Authority.
- The application shall include all information and requirements set out in Schedule 1 of this regulation, which are detailed as follows:

TABLE 46: APPLICATION REQUIREMENTS FOR A RECONNAISSANCE LICENSE

N° Information required for a Reconnaissance License application
1 The name of the company applying for the Reconnaissance License.
2 Particulars of the incorporation or registration of the company, including the name and nationality of the directors and shareholders.
3 An identification and description of the area to which the application relates. This may include GPS coordinates, maps, metes and bounds, etc.
4 The period for which the license is required but not exceeding two years.
5 The work proposed to be carried out and the proposed budget.
6 Evidence of financial capability to carry out the work program through provision of three years prior financial statements.
7 Evidence of technical capability by submitting information relating to similar work conducted in the past or members of the team who have extensive experience in conducting such work.
8 An assessment of the impact which the proposed operations may have on the environment. This is not an Environmental and Social Impact Assessment (ESIA) which shall be required, in the license, prior to commencement of any activity by the license holder.

Pre-qualification requirements for granting of Petroleum Rights - Offshore Liberia

Under the LPRA Regulatory Instrument N°0002/LPRA/20⁵³ related to the Pre-qualification requirements for granting of Petroleum Rights - Offshore Liberia:

- Companies interested in acquiring offshore petroleum rights shall apply to the LPRA for pre-qualification. Only companies which acquire or expect to acquire at least 10% equity interest in the petroleum agreement awarded for a block are required to be pre-qualified.
- A company which applies to be an Operator shall pay to LPRA a non-refundable fee of US\$ 50,000 in case of direct negotiations and US\$ 20,000 in case of a bid round. A company which applies to be a Participant shall pay to LPRA a non-refundable fee of US\$ 30,000 in case of direct negotiations and US\$ 15,000 in case of a bid round. Without prejudice to the foregoing, Liberia owned companies or companies where majority of the voting interest are held by natural persons of Liberian Citizenship shall pay US\$ 25,000 in case of direct negotiations and US\$ 5,000 in case of a bid round.

⁵³ <https://lpra.gov.lr/lpra/download/10/laws-regulations/813/regulations-on-pre-qualification-of-companies-interest-in-acquiring-offshore-petroleum-rights.pdf>

- The application shall include all information and requirements of this Regulation, set out in Schedule 1 relating to the requirements for legal documents, Schedule 2, demonstrating financial capacity and Schedule 3, demonstrating technical capacity, which are detailed as follows:

TABLE 47: PRE-QUALIFICATION REQUIREMENTS FOR GRANTING PETROLEUM RIGHTS

Type of requirements	Pre-qualification requirements for granting Petroleum Rights
Legal Documentation Requirements	- Name of the Applicant (as set forth in its organizational documents).
	- Date and place of incorporation or organization.
	- Address of applicant's Registered Office and of applicants' principal place of business (including website address).
	- Registration number and country of residence, where applicable.
	- An outline of the corporate structure, including an explanatory diagram, if appropriate, showing parent, subsidiary and affiliate companies.
	- If the applicant is not the ultimate parent entity, list any ultimate entity of the entity, the location of its principal office, and the jurisdiction under the laws of which it is organized. For the purposes of this regulation, the ultimate parent entity is any legal entity (including a government, trust, partnership or other non-corporate entity) that ultimately controls the applicant.
	- List of all companies or individuals known to the applicant or the ultimate parent entity (with detailed address attached) which directly or indirectly own or have beneficial interest, voting or equity interest of more than 5% in the applicant.
	- Any civil or criminal penalties sought from or assessed against the ultimate parent company or any entity controlled by it in the petroleum exploration and development business during the previous five years for (a) environmental or safety requirements violations, or (b) violation of laws, rules or regulations relating to bribery or other corrupt practices, in each case stating the nature of alleged violation.
Financial Capability Requirements	- Description of any circumstances in which the ultimate parent company or any entity controlled by it has been party to a petroleum exploration or development contract with a government unit (a) which contract the governmental unit has sought to terminate the contract based on the contractor's default or failure to perform, or (b) pursuant to which contract the contractor has commenced an arbitration against the governmental unit.
	- Details of financial status for three successive years preceding the application (audited financial statements of applicant) and of the ultimate parent company if the applicant is not the ultimate parent company).
Technical Capability Requirements	- For operators, evidence of total minimum equity of US\$ 200 million or total asset value of at least US\$ 500 million. For participants, proof of minimum equity of at least US\$ 50 million, together with a summary of major existing financial commitments for the next three years.
	- CVs of technical and managerial team.
	- Document/evidence of deep-water petroleum exploration programs carried out by the applicant, its ultimate parent or other wholly owned subsidiaries of the ultimate parent acting as operator with the responsibility for selecting well

Type of requirements	Pre-qualification requirements for granting Petroleum Rights
	locations. For this purpose, a “deep water exploration program” is carried out with respect to a block having an average depth of at least 1,000 meters.
	- Demonstrate by submitting document/evidence of experience in working in a given geological environment (i.e. experience in the West Africa Transform Margin (WATM), stratigraphy/structural play).

Transfer process of petroleum rights

Sub-section 65.2 of the Petroleum Law reform 2014 states that, “Except as stipulated in the petroleum right, a sale, assignment, pledge, mortgage or other transfer of any right, title or interest in any petroleum right, whether directly or indirectly, shall not be made without the prior written consent of the Director General”.

Direct Negotiations for 29 Offshore Blocks

Pursuant to the suspension of the open competitive international tender for offshore blocks in the coveted frontier Harper Basin launched in April 2020 due to several significant factors including the recent investment climate, the latent impact of the energy transition, COVID-19 and its cascading effect on the sector. The Government of Liberia, through LPRA, following a 6-month extension, has indefinitely suspended the 2020 bid round and opted for Direct Negotiations to extenuate the current hurdle faced by international exploration and production companies and to offer an attractive opportunity for investment in Liberia.

The Direct Negotiation process that was launched on 1st June 2021 and covered 33 offshore blocks within the offshore Liberia acreage, including the Harper and Liberia Offshore Basins, resulted in the expression of interest of ExxonMobil in four blocks (15, 16, 22 and 24) within the Liberia Basin In April 2023 and the company had officially applied to be pre-qualified to negotiate for the Blocks. To date, there is no information as to whether the company signed a PSC with the LPRA covering the blocks referred to above.⁵⁴

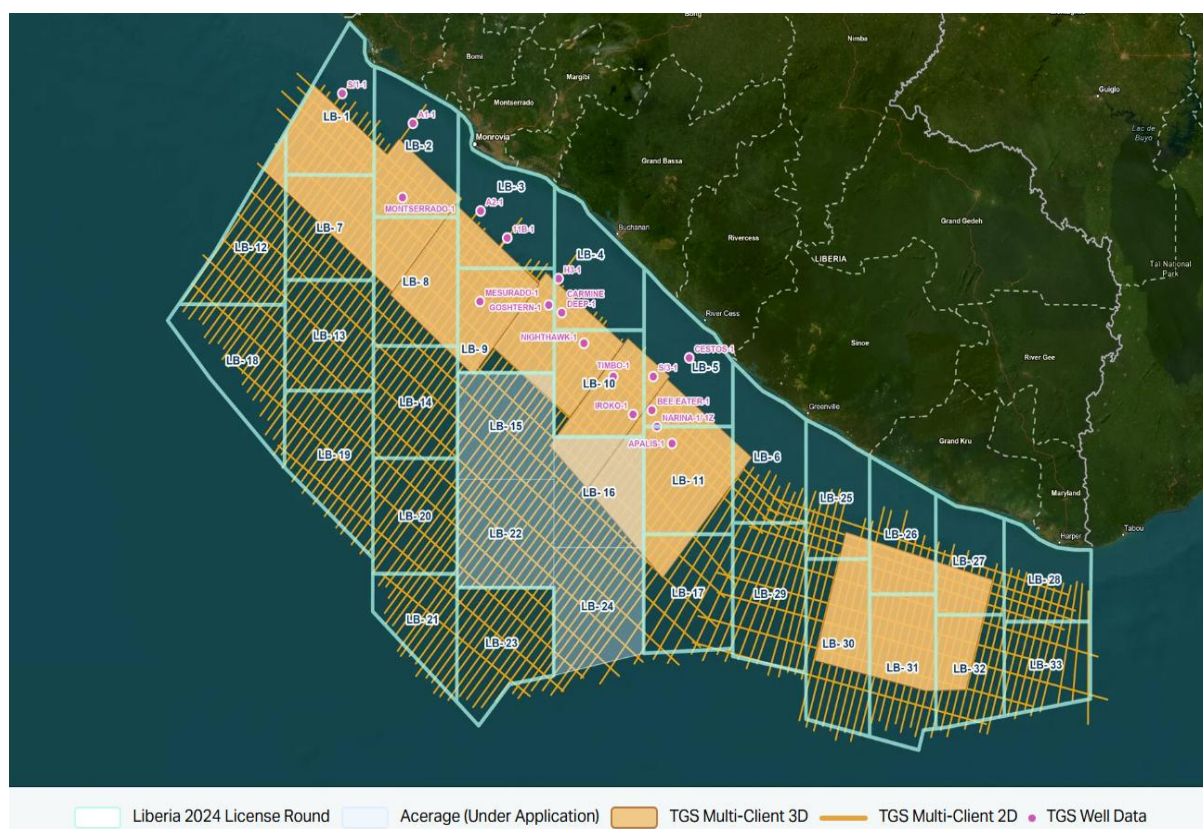
In August 2024, the LPRA launched, through a public announcement, the 2024 Direct Negotiations Licensing Round covering the remaining 29 blocks.

The Direct Negotiations Licensing Round brochures fixed 15 October 2024 as a due date for applicants to submit their applications for Operator prequalification, while the identification of blocks of interest shall be done by no later than 15 November 2024. The brochure did not preview a deadline for negotiations.

The data related to each block are publicly available via this [link](#). The blocks made available during this direct negotiation licensing round are presented in the map below:

⁵⁴ <https://mailchi.mp/1a3ff1ff6af0/lpra-receives-pre-qualification-application-from-exxonmobil?e=ece56ef69e>

FIGURE 21: MAP OF THE 33 BLOCKS OFFERED FOR DIRECT NEGOTIATIONS



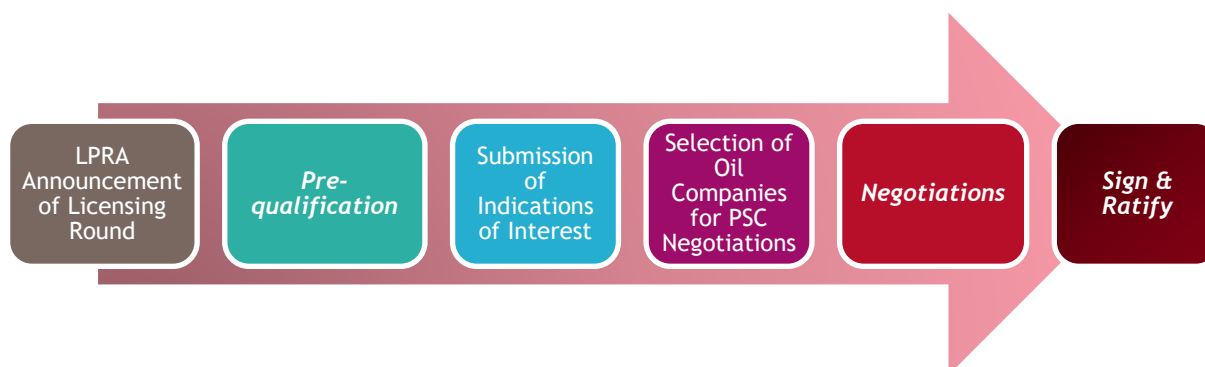
The participation in the 2024 Direct Negotiation Licensing round was limited to:

- Oil companies that have significant practical experience in exploration, development and production in the conditions in the blocks involved, and satisfy the prequalification requirements set forth in [Annex 2](#), and
- Oil companies that have significant successful exploration experience in the conditions to be expected in the blocks involved, but that lack experience in developing and operating commercial petroleum discoveries at comparable depths and/or the financial capacity to carry out such development and production, may also prequalify by
 - setting forth such exploration experience,
 - demonstrating the financial capacity to support the exploration period, and
 - stipulating that any PSC they enter into will provide that upon a commercial discovery they must be replaced as operator by an operator that satisfies all the prequalification requirements set forth in [Annex 2](#), and
 - otherwise satisfying the pre-qualification requirements set forth in [Annex 2](#).⁵⁵

⁵⁵ <https://www.tgs.com/hubfs/2024%20Liberia%20Licensing%20Round%20-%20Invitation%20to%20Participate.pdf>

Direct Negotiation is framed through a 6-phase process, as detailed in the below figure:⁵⁶

FIGURE 22: DIFFERENT PHASES OF THE DIRECT NEGOTIATION PROCESS



4.3.2.(c) Petroleum licenses awarded and transferred during the reporting period

No new licenses or contracts were awarded in the oil and gas sector during FY 2023 according to LPRA.

4.3.3. Concession Allocations in the Forestry Sector

4.3.3.(a) Types of Forestry Licenses and Concessions

The forestry sector previews three main types of forestry license, namely: Forestry Management Contracts (FMC), Timber Sales Contract (TSC) and Community Forest Management Agreement (CFMA). The details of each license, areas and validity have been presented in the table below:

TABLE 48: TYPE OF LICENSES AND CONCESSIONS IN THE FORESTRY SECTOR

License Type	Description	Area (not to exceed)	Duration
Forestry Management Contract (FMC)	Long term contracts for large areas. Small FMCs are reserved for majority-owned (51%) Liberian companies although they represent an opportunity for joint ventures between domestic and foreign partners. There are no restrictions on company ownership for larger FMCs.	- Large FMCs: up to 400,000 hectares. - Small FMCs: 50,000 - 100,000 hectares.	25 years

Timber Sale Contract (TSC)	For small areas and usually short-term contracts. TSCs are focused on areas that will likely be cleared for plantations or farming, and as such, the management requirements for harvesting the timber are less onerous. Thus, TSCs require less planning and can be awarded more easily than FMCs. TSCs are also reserved for majority-owned Liberian companies.	Less than 5,000 hectares. 3 years
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⁵⁶ <https://lpra.gov.lr/licence/>

License Type	Description	Area (not to exceed)	Duration
Community Forest Management Agreement (CFMA)	Issued to communities for community-based management forest with specific community-based governance structures.	Less than 50 hectares.	15 years

4.3.3.(b) License and Concession Application Process in the Forestry Sector

Licenses and Concessions application requirements

As provided by the national forestry reform law, 2006 and the Public Procurement and Concession Act, 2010, the allocation of concessions requires the following process and requirements to be met. All license applications are expected to be conducted under competitive bidding process. Below are the key requirements for application for forestry licenses:

TABLE 49: LICENSE APPLICATION REQUIREMENTS IN THE FORESTRY SECTOR

License	Application requirements
Forest Management Contract (FMC)	<p>FMCs must meet all the following requirements:</p> <ul style="list-style-type: none"> - the land area involved must be identified as a potential concession in the National Forest Management Strategy in effect at the time the concession is offered and must be validated. - the land involved must not include private land; - the contract must require the Holder to perform actions necessary for sound, long-term forest management, including inventories, preparation of management plans, and annual operations plans; - the contract must require the Holder to prepare all environmental impact assessments required under the laws governing environmental protection; - the contract must require the Holder to submit a business plan to the Authority and to demonstrate to the Authority's satisfaction that the Holder has the technical and financial capacity to manage the forest sustainably; - the contract must require the Holder to establish a social agreement with local forest-dependent communities, approved by the Authority, which defines these communities' benefits and access rights; - the contract must require the Holder to pay the Government the fee that the Holder bids on the concession process, in addition to any other applicable taxes and fees, for the privilege of harvesting or using Forest Resources; - the basic terms of the contract must approximate the length of a forest rotation on the land based on a sustainable yield of timber products, although the contract may be terminated sooner for cause; - the land area subject to the contract must be at least 50,000 hectares and no more than 400,000 hectares; and - the Annual Coupe must allow the Holder to harvest every suitable area once during the term of the contract.
Timber Sale Contract (TSC)	<p>TSCs must meet all the following requirements:</p> <ul style="list-style-type: none"> - the contract must be consistent with the National Forest Management Strategy in effect when the contract is awarded, and the area must be validated; - the land involved must not include private land;

License	Application requirements
	<ul style="list-style-type: none"> - the basic terms of the contract must not be more than three years; - the land area subject to the contract must be no more than 5,000 hectares; - the contract must require the Holder to prepare an annual operations plan; and - the contract must require the Holder to pay the Government the fee that the Holder bid in the concession process, in addition to any other applicable taxes and fees, for the privilege of harvesting or using Forest Resources.
Community Forest Management Agreement (CFMA)	<p>CFMAs must meet all the following requirements:</p> <ul style="list-style-type: none"> - specify rights and responsibilities of communities with respect to ownership and uses of Forest Resources; - set up mechanisms to promote informed community participation in forest-related decisions; - create a framework that allows communities fair access to Forest Resources; and - establish social, economic, and technical procedures for capacity building to ensure that communities can equitably participate in and equitably benefit from sustainable management of the forests.

Technical and Financial Criteria used for awarding Licenses and Concessions

The basis of the requirement for the technical and financial criteria for awarding Concessions in the Forestry sector is stipulated in Section 5.3 (b) (v) of the National Forestry Reform law, 2006,⁵⁷ while the Public Procurement and Concessions Act, 2010 specifies the minimum requirements for technical and financial evaluations of bids.⁵⁸

Prequalification

According to The Public Procurement and Concessions Act of 2010, the evaluation criteria applicable to a request for expressions of interest (pre-qualification) shall take into consideration the requirements of the proposed concession and the nature of the expertise required for efficient and effective implementation of the Concession.

The FDA's Regulation 103-07⁵⁹ sets out the procedures for prequalification. This Regulation concerns screening and prequalification of bidders on Forest Resources Licenses. It is made under provisions of the National Forestry Reform Law of 2006 that governs contracting and permitting and standard qualifications for commercial forest operations.

The FDA shall keep a list of debarred Persons and a list of suspended Persons in accordance with Section 44 of the Public Procurement and Concessions Act. If a Person is on the list of debarred Persons or the list of suspended Persons, the Person is ineligible to bid on a Forest Resources License offered through a concessions process. Any Person may appeal a decision of the Authority to the Board of Directors of the Forestry Development Authority.

Only Persons with a valid prequalification certificate may submit bids for Forest Resources Licenses offered as concessions.

⁵⁷ <https://faolex.fao.org/docs/pdf/lbr67626.pdf>

⁵⁸ <https://faolex.fao.org/docs/pdf/lbr180718.pdf>

⁵⁹ <https://faolex.fao.org/docs/pdf/lbr160082.pdf>

Bid Evaluation Criteria

Section 5.3 (v) of the National Forestry Reform Act 2006 stipulates that the contract must require the Holder to submit a business plan to the Authority and to demonstrate that it has the technical and financial capacity to manage the forest sustainably.

The Forestry Development Authority's Regulation 104-07⁶⁰ sets out policy principles, requirements and procedures of tendering, awarding and administering Forest Management Contracts (FMCs), Timber Sale Contracts (TSCs), and Major Forest Use Permits. According to this Regulation, Successful bidders and Holders of FMCs and TSCs shall post an annual performance bond to assure payment of amounts due the Government, including taxes, fees, damages, and penalties. The Regulations also provide with respect to assignment of Contracts to third parties and the requirement that operations be in conformity with plans and (environmental impact) assessments.

The Public Procurement and Concessions Act of 2010 specifies the minimum contents of the evaluation criteria. The evaluation criteria applicable to an invitation to bid shall be designed to attain the objects of the concession and shall include at least the following:

TABLE 50: BID EVALUATION CRITERIA ACCORDING TO THE PUBLIC PROCUREMENT AND CONCESSIONS ACT

N° Bid Evaluation criteria used for awarding Forestry Licenses and Concessions	
1	Compliance of the bidder with any specific technical and financial requirements stated in the bid documents (including any required bid security).
2	Technical and financial capacity of the bidder to carry out all phases of the proposed project.
3	Technical feasibility of the proposal.
4	Effectiveness of the methods and resources to be deployed.
5	In the case of infrastructure projects for the delivery by private entities of public services or facilities that will serve the general public where the bidders are not bidding to provide contract-mandated Amended and Restated Public Procurement and Concessions Act 101 levels of service, the magnitude of the planned service level improvements over the Concession period.
6	If the Government has adopted overall strategic objectives and national development plans, the extent to which the proposed concession contributes to the realization of such plan.
7	Technology transfers.
8	Impact on the environment and compliance with environmental laws and regulations.
9	Expected effects of the concession on national income, employment of Liberians, the communities affected (social impact considerations), industries and other sectors of the economy.
10	Direct financial benefits flowing to the government from the award of the concession.
11	Negative impacts on government revenues of any financial concessions proposed to be granted.
12	Any margin of preference applicable in accordance with Section 99 of this Act.

⁶⁰ <https://faolex.fao.org/docs/pdf/lbr1600q83.pdf>

Processes for License or Ownership Transfers

Section 6.2 of the National Forestry Reform Law of 2006 stipulates that no person shall assign a Forest Resources License without prior, written approval of the Authority. Any assignment of a Forest Resources License without prior, written approval of the Authority is void. The Authority shall not approve an assignment or transfer of a Forest Resources License to a Person who fails to satisfy the basic qualifications set forth in this Law. The Authority may establish by Regulation additional standards governing assignments and transfers.

4.3.3.(c) Forestry Concessions awarded and transferred during the reporting period

The FDA has confirmed that there was not any award / transfer of forestry license during FY 2023.

4.3.4. Concession Allocations in the Agriculture Sector

Agricultural concessions are granted as per the Public Procurement and Concessions Act, 2010, which provides the legal basis for the national procurement of goods and services. The same process applies to the Forestry Sector.

4.3.5. National Local Content

Section 75 of Title 18 of the Liberian Codes of Laws Revised in 1976, states that it is not allowed to hire a foreign employee unless the list of qualified Liberians had been exhausted or there is no qualified person on the list capable of performing the job. This is not applicable to administrative, supervisory, or technical positions. The employer would then have to report to the Minister of Labor his inability to find a suitable Liberian candidate, in which case, a special permit will be granted to hire the service of foreigner. Salaries given to the foreign employment would have to be the same as the one that would have been paid to a Liberian citizen in similar position, with equal competence or length of service.

A number of investment incentives are also provided for new investment activities under the Liberia Revenue Code of 2000 (amended in 2011). Certified firms are eligible for special investment incentives, for a period of five years if their investments exceed US\$ 1,000,000 or, in the case of a business with 100% Liberian ownership, the capital invested exceeded US\$ 500,000. For large investments exceeding US\$ 10 million, the tax incentives could go up to 15 years. To be eligible, firms need to inject new investments and operate in 15 priority areas, including manufacturing finished products having at least 60% local raw material contents and capital invested exceeding US\$ 100 000, which may be applicable to the extractive sector.

Mining sector⁶¹

The main local contents-related provisions under current legislation are detailed in Section 20 of the Mining Act 2000, which sets out provisions common to all mining licenses as follows:

- *Section 20.2: No operator or its contractor or subcontractor shall employ foreign unskilled labor. To the maximum extent feasible an operator or its contractor or subcontractor shall give preference and employ Liberians at all levels of their*

61 <https://www.a-mla.org/en/country/pdf/48>

operations structure, particularly in skilled, technical, administrative, financial or managerial positions.

- *Section 20.3: Any and all operators, contractors or sub-contractors shall provide on a continuing basis appropriate training for their Liberian employees, in order to qualify them for skilled, technical, administrative, financial or managerial positions”.*

Similarly, “holders of mineral rights and their respective contractors and sub-contractors shall conduct business in Liberia in such a way as to encourage the transfer of technology to Liberians to the fullest degree possible”. Mining firms are also obliged under the Law to contribute to a Mineral Development Fund that administers various activities to help develop the sector.

Specific provisions are also found in the MDAs. These relate to employment provisions, training and capacity building and local procurement.

We present in the table below a summary of the local content provisions in the current mining sector legal frameworks:

TABLE 51: LOCAL CONTENT PROVISIONS RELATED TO THE MINING SECTOR

National Content requirement	Details of requirements	Applicability in Liberia	Legal framework
Employment provisions	Compulsory requirement prohibiting employment of foreign labor in unskilled positions.	Mining operators are not allowed to employ foreign unskilled labor.	Mining and Minerals Law 2000 ; MDAs
	Requirement to employ local labor in skilled positions.	The Mining Law states that a preference in skilled / technical /managerial positions should be given to Liberians. Mineral Development Agreements (MDAs) typically state that firms must submit a plan to ensure that 30% of such positions are filled by Liberians after five years, and 70% after 10 years.	
Local procurement provisions	Firms to source inputs from domestic suppliers only if available on a competitive basis.	Firms must ‘to the maximum extent possible’ give a preference when purchasing goods and services to those produced by Liberian firms (where the latter are defined as being those where Liberians are entitled to receive at least 60% of profits), provided that such goods are comparable to those obtainable from other sources.	MDAs
Capability and knowledge development	Requirement for the training of local labor or certification of local supplier.	The Mining Law states that training should be provided to enable Liberians to qualify for skilled / technical /managerial positions.	Mining and Minerals Law 2000 ; MDAs

National Content requirement	Details of requirements	Applicability in Liberia	Legal framework
		Mineral Development Agreements (MDAs) typically set out instruments (e.g. overseas scholarships, donations to local universities) to achieve this, where necessary and operationally possible.	
R&D contribution and transfer of technology	<p>Firms required to transfer technology to local firms</p> <p>Firms required to carry out some levels of R&D locally</p>	<p>Firms must conduct business ‘in such a way as to encourage technology transfer’.</p> <p>Up to two professionals, including geologists, mining engineers, surveyors etc., must participate in technical aspects of operations as well as marketing activities.</p> <p>Firms are obliged to contribute to a Mining Development Fund.</p>	Mining and Minerals Law 2000 ; MDAs

Oil and Gas sector

The main local contents-related provisions under Petroleum (Exploration and Production) Act (2014), which sets out provisions common to all oil and gas licenses as follows:

- *Section 43.1: A contractor and its subcontractors shall ensure that opportunities are given to qualified Liberian citizens for employment in various levels of their Liberian operations and shall implement or provide training programs for this purpose and as such shall be stipulated in the petroleum agreement.*
- *Section 44.1: A contractor and its subcontractors shall give preference to enterprises, goods and services provided or supplied by Liberia citizens or business entities controlled by Liberia citizens, where conditions of price, quality, delivery time, service and terms of payment are equivalent to those from other countries or from non-Liberian sources.”*

Specific local content related provisions are also found in the model of the PSC. These relate to employment and training provisions, citizens participation and local purchases of goods and services.

We present in the table below a summary of the main local content provisions related to the oil and gas sector according to the model PSC:

TABLE 52: LOCAL CONTENT PROVISIONS RELATED TO THE OIL AND GAS SECTOR

National Content requirement	Details of requirements according to the model PSC
Employment and Training of Liberian citizens	<p>Art 13.1 The Contractor shall employ Liberian citizens in the performance of Petroleum Operations in Liberia whenever suitably qualified and available for employment. In furtherance of this requirement:</p> <ul style="list-style-type: none"> - the Contractor shall hire only citizens of Liberia for unskilled and semi-skilled labor positions within Liberia or on-board vessels or equipment stationed in Liberian waters;

National Content requirement	Details of requirements according to the model PSC
	<ul style="list-style-type: none"> - the Contractor and its subcontractors shall ensure that opportunities are given to qualified Liberian citizens for employment in various levels of their Liberian operations and shall implement or provide training programs; - each development and production plan shall include plans to train Liberian citizens in the full range of managerial and technical activities involved in the performance by the contractor of its obligations under the petroleum agreement, including without limitation engineering design, information technology, petroleum geology technology, production facility operations and maintenance, contract negotiation and contract management; and - the Contractor shall give preference to the employment of competent and suitably qualified citizens of Liberia as executives, managers, technicians, engineers, accountants, geologists, geophysicists, scientists, chemists, drillers, foremen, mechanics, skilled workers, secretaries and executive employees as and when such positions become available unless and to the extent that such competent and suitably qualified citizens are not available for such positions, in which case non-Liberians may be hired for such positions. <p>Art 13.3 The Contractor shall provide funding of training programs for employment in various levels of the Liberian operations of the Contractor and its subcontractors and for that purpose the Contractor shall devote an annual training budget of:</p> <ul style="list-style-type: none"> - US\$ 200,000 during each year of the exploration and appraisal period; and - US\$ 1,000,000 in relation to each exclusive exploitation authorization during each year of any such authorization. <p>Additionally, the Contractor shall make an annual contribution during the term of the Contract of \$150,000 to all public universities and colleges for the enhancement of programs related to petroleum operations including but not limited to geology, engineering and environmental studies,</p> <p>Art 13.4 The Contractor shall provide funding for social and welfare programs in Liberia and for that purpose the Contractor shall devote an annual social and welfare budget of:</p> <ul style="list-style-type: none"> - US\$ 175,000 during each year of the exploration and appraisal period; and - US\$ 500,000 in relation to each exclusive exploitation authorization during each year of any such authorization.
Local procurement of goods and services	<p>Art 13.7 The Contractor and its subcontractors shall be obligated to give preference to services and goods provided by Liberian citizens or business entities controlled by Liberian citizens, if conditions of price, quality, delivery time, service and terms of payment are substantially similar to those from other countries or from non-Liberian sources.</p> <p>Art 13.9 Within no more than 180 days following the Effective Date, the Contractor shall deliver to the LPRA a project linkages plan for the exploration period which:</p> <ul style="list-style-type: none"> - identifies the potential for local suppliers, contractors and service providers to provide goods and services to Petroleum Operations. - identifies key interventions to increase local participation in the provision of goods or services to Petroleum Operations; and - sets out a local project purchase plan complying with clear milestones identified in terms of an increasing percentage of local purchases of goods and services, and providing for bidding preferences for local suppliers, contractors and service providers.

National Content requirement	Details of requirements according to the model PSC
Citizen participation	<p>Art 17.2 The State shall have the right to receive a 5% undivided participating interest in the Contractor’s rights and obligations:</p> <ul style="list-style-type: none"> - The Citizen Participation shall be granted by the Contractor at no cost to the State or NOCAL, and shall be held and managed by NOCAL for the benefit of a citizen participation fund. - All amounts distributable on account of the Citizen Participation shall be deposited in a citizen participation fund which shall be held and managed by a trustee which shall be a responsible international trust company selected by the Ministry of Finance and Development Planning in consultation with the Central Bank of Liberia, under a trust agreement that provides for the administration of the fund.

Forestry sector

The National Forestry Reform Law (2006) does not include any provisions regarding local content. However, after reviewing some forestry contracts, we noted local content provisions related to hiring of employees and staff training, as follows:

- in the selection of employees to conduct its operations, the holder shall give preference to competent and qualified individuals living in and near the contract area and particularly to individuals from communities benefiting from the holder’s social agreements;
- the holder shall not import unskilled labor from outside Liberia; and
- the holder shall comply with all training and employment obligations required by law or regulation.

Agriculture sector

We noted the following local content provisions in the agricultural concession agreements:

- Employment and training;
- Use of Liberian Products and Services;
- Manufacturing; and
- Community Resources.

4.4. Register of licenses

The EITI Standard requires implementing countries to maintain a publicly available register or cadastre system which must be kept up to date with comprehensive information regarding each of the licenses pertaining to companies covered in the EITI Report: i. Name(s) of license holder(s); ii. Coordinates of the licensed area; iii. Date of application, date of award and duration of the license; and iv. In the case of production licenses, the commodity being produced.

The Liberia National Concessions Portal is an online cadastre system including interactive map for the oil, gas and mining agreements as well as the forestry and agricultural concessions.

For each agreement and concession, the portal provides information on:

- the land parcel and total area;
- the type and status of each agreement or concession;
- the identity of the holder;
- the duration (start date and expiry date); and
- the commodity produced.

The Liberia National Concessions Portal used to be publicly available [here](#). However, the link is not functioning anymore.

4.4.1. Register of Mineral Licenses and Contracts

The MME publishes all mining licenses, including reconnaissance, exploration, and mining, via the [Online Repository](#). The Portal allows the search by license code or by holder name and provides information on:

- the identity of the license holder;
- the status of the license;
- the date of application;
- the date of award;
- the expiry date;
- the commodity produced; and
- the area of the license.

The Online Repository is further linked to the tax authority's system. This system allows to publish revenues from the sector online and therefore makes a significant contribution to transparency efforts in license management.

According to the list of mining licenses received from MME, there were 237 mineral rights in existence as of 31 December 2023, as detailed in the table below:

TABLE 53: MINERAL RIGHTS IN EXISTENCE AS OF 31 DECEMBER 2023

Licenses awarded during the reporting period	Number
Class C Mining License	95
Class B Mining License	77
Class A Mining License	7
Exploration License	58
Total	237

Source: The Ministry of Mines and Energy (MME)

The list of mining rights in existence as of 31 December 2023, is detailed in Annex 2 to this report.

4.4.2. Oil and Gas Contracts and License Register

Sections 63 and 64 of the New Petroleum (Exploration and Production) Act, 2014, require compliance with LEITI's Act and the Freedom of Information Act (2010). The sections also require the publication of all petroleum rights, including all annexes and schedules.

No new licenses or contracts were awarded in the oil and gas sector during FY 2023 according to LPRA. There are also no active licenses as of that period.

4.4.3. Forestry Concessions and License Register

The National Forestry Reform Law of 2006 does not require holding a public register of forestry licenses. However, sub-section 4.1 (f) of the LEITI Act 2009 stipulates that all companies operating in the oil, mining, agriculture, and forestry sector in Liberia must be registered in a public database.

The National Bureau of Concessions (NBC) provided the list of the active licenses in the forestry sector that are summarized by license type in the table below:

TABLE 54: ACTIVE FORESTRY SECTOR LICENSES IN LIBERIA⁶²

Forestry License	Number of active licenses
Forest Management Contract (FMC)	1
Community Forest Management Agreement (CFMA)	9

4.4.4. Agriculture Concession and License Register

The Liberia Agriculture Law does not require offsetting up a public register of forestry licenses. However, sub-section 4.1 (f) of the LEITI Act 2009 stipulates that all companies operating in the oil, mining, agriculture, and forestry sector in Liberia must be registered in a public database.

The NBC list included ten (10) active concessions for companies operating in the agriculture sector as presented in the table below:

TABLE 55: LIST OF THE ACTIVE CONCESSIONS IN THE AGRICULTURE SECTOR⁶³

Company	Commodity	Year	Expiry
Nimba Rubber Incorporated	Rubber	1949	2029
Salala Rubber Corporation	Rubber	1959	2029
Liberia Agricultural Company	Rubber	1959	2029
LIBINC Oil Palm Inc.	Oil Palm	2008	2048
Firestone Liberia LLC.	Rubber	2008	2041
Mano Palm Oil Plantation	Oil Palm	2009	2072
Golden Veroleum Inc.	Oil Palm	2010	2075
Maryland Oil Palm Plantation	Oil Palm	2011	2036
Cavalla Rubber Corporation	Rubber	2011	2061

⁶² [status_of_concessions_in_liberia_2021.pdf](#) ([leiti.org.lr](#))

⁶³ [status_of_concessions_in_liberia_2021.pdf](#) ([leiti.org.lr](#))

4.5. Disclosure of licenses and contracts

EITI requirement 2.4 states that implementing countries are encouraged to publicly disclose any contracts and licenses that provide the terms attached to the exploitation of oil, gas and minerals.

As such, the LEITI secretariat, alongside other government agencies, took initiatives to provide information on the active licenses, contracts and agreements in the mining, agriculture and forestry sector. As such, the LEITI MSG decision of April 2022 stipulated that all Oil & Gas, Agriculture and Forestry contracts and concessions, in addition to MDAs, class A and Class B mining licenses shall now be published on the LEITI website. Due to the volume and complexity around the disclosure of the ASM sector, the MSG agreed that only the list of active ASM licenses (Class C mining licenses) will be disclosed on the EITI report.⁶⁴

The major sources of information that served as a basis for us to trace information regarding licenses and contracts are summarized in the table below:

TABLE 56: SOURCES OF AGREEMENTS AND CONCESSIONS DISCLOSURE IN LIBERIA

Source	Description
LEITI website and LEITI data warehouse	<p>The LEITI website is the main platform for licenses, contracts, agreements and concessions, and includes search features that allow keywords to be searched, and documentation filtered according to title. The website also has a function which allows documentation to be filtered by sector, nevertheless this feature does not gather all the available concessions for each sector.</p> <p>In addition, the LEITI data warehouse includes, among other extractive-sector related data, the lists of all active licenses, as well as the full text of class A mining licenses, in addition to forestry and agriculture contracts and concession agreements in application of the MSG decision referred to above.</p>
Resource Contract website	<p>The website is a repository of publicly available oil, gas, and mining contracts in machine-readable, searchable, open-data format for 99 countries around the world. The portal is managed by the Natural Resource Governance Institute (NRGI) in partnership with the Columbia Centre on Sustainable Investment and the World Bank.</p>

4.5.1. Disclosure of contracts and licenses in the mining sector

The Minerals and Mining Act (2000) does not provide for a public register of mining licenses to be held. However, the 2009 LEITI Act, stipulates that concessions and licenses of all companies operating in the oil, mining, agricultural and forestry sectors in Liberia must be publicly accessible.

The status of concessions in Liberia provided by the National Bureau of Concessions (NBC) referred to seven active MDAs and their respective class A mining licenses that are presented below:

⁶⁴https://leiti.org.lr/sites/default/files/documents/Final%20Approved%20MSG%20Policy%20on%20Contract%20Disclosure_0.pdf

TABLE 57: LIST OF ACTIVE MINERAL DEVELOPMENT AGREEMENTS (MDAs) AND CLASS A MINING LICENSES

N°	MDA	Start date	Expiry	MDA	Class A license
1	Bea Mountain Mining, Inc	2023	2048	Link	Link
2	Arcelor Mittal	2007	2032	Link	Link
3	China Union Liberia	2009	2034	Link	Link
4	Mermet Nizif Gonelle (MNG) Kokoya (Amlib- Kokoyah)	2002	2027	Link	Link
5	Western Cluster	2011	2036	Link	Link
6	Putu Iron Ore Liberia	2010	2035	Link	Link
7	Bao Chico Resources Liberia	2021	2046	Link	Link

Source: National Bureau of Concessions (NBC)

The full text of the active MDAs and class A mining licenses is published on the links in the table above. However, out of 77 active class B mining licenses, only 57 have their full text published on the platforms detailed above as required by the LEITI MSG decision of April 2022. The details of class B mining licenses disclosed is presented in the Annex 3 of this report.

The online cadastral system provides information on license holders, co-ordinates of the licensed areas, date of application award and duration of the license as well as the commodity being produced. Details on the mining licenses, including the full text, are not publicly available.

4.5.2. Disclosure of contracts and licenses in the oil and gas sector

Sections 63 and 64 of the New Petroleum (Exploration and Production) Act, 2014 require compliance with LEITI's Act and the Freedom of Information Act (2010). The sections also require the publication of all petroleum rights, including all annexes and schedules.

At the time of writing, no petroleum agreement had been signed in the period under review. Hence, no oil and gas contract had been published. NOCAL has an online interactive map which provides details on each oil and gas block including, block name, size, location, license type, contractors name, present wells. The map can be accessed [here](#).

The previous 2021 model of the PSC that might be used in case of agreement with petroleum companies is available on the [LEITI](#) website, while the new model as updated in May 2025 is available on the [LPRA](#) website. This model includes the scope of the contract, its duration, contractors' obligations and rights, production sharing, taxation, valuation etc.

4.5.3. Disclosure of concessions and licenses in the forestry sector

The National Forestry Reform Law of 2006 does not provide for a register of forestry licenses to be held and made publicly available. However, sub-section 4.1 (f) of the LEITI Act 2009 stipulates that all companies operating in the oil, mining, agriculture, and forestry sector in Liberia must be registered in a public database.

The full text of the active concession agreements and contracts in the forestry sector as provided by the NBC are publicly available on the LEITI website. Other previous forestry agreements not indicated in the NBC list were also available on the LEITI website:

TABLE 58: PUBLISHED FORESTRY SECTOR ACTIVE LICENSES

Company	Area	License type	Year	Link
Westnaf Limited	Chedepo	CFMA	2022	Link
West Water Group (Liberia), Inc.	District 3B&C 2	CFMA	2021	Link
Kisvan Timber Corporation	Marbon	CFMA	2021	Link
West Water Group (Liberia), Inc.	Blinlon	CFMA	2020	Link
Kisvan Timber Corporation	Central Morweh	CFMA	2019	Link
Renew Forestry Group, LLC	District 3B&C	CFMA	2018	Link
Iroko Timber & Logging Corporation	Central River Dugbe	CFMA	2011	Link
Liberia Tree and Trading Company	Gbi Chiefdom	CFMA	2011	Link
Liberia Tree and Trading Company	Doru	CFMA	2011	Link
Euro Liberia Logging Company	Grand Gedeh & River Gee	FMC	2009	Link

4.5.4. Disclosure of concessions and licenses in the agriculture sector

In the absence of provisions in the Liberia Agriculture Law related to a register of licenses in the agriculture sector, the sub-section 4.1 (f) of the LEITI Act 2009 covers this deficiency as it provides for that all companies operating in the oil, mining, agriculture, and forestry sector in Liberia must be registered in a public database.

According to the status of concessions in Liberia provided by the NBC, there are actually nine (9) active concessions in the agriculture sector as detailed in section 4.4.4 of this report. The LEITI secretariat published in its website the integral texts of these concessions.

TABLE 59: PUBLISHED AGRICULTURE SECTOR ACTIVE CONCESSION AGREEMENTS

Company	Commodity	Year	Expiry	Link
Nimba Rubber Incorporated	Rubber	1949	2029	Link
Salala Rubber Corporation	Rubber	1959	2029	Link
Liberia Agricultural Company	Rubber	1959	2029	Link
LIBINC Oil Palm Inc.	Oil Palm	2008	2048	Link
Firestone Liberia LLC.	Rubber	2008	2041	Link
Mano Palm Oil Plantation	Oil Palm	2009	2072	Link
Golden Veroleum Inc.	Oil Palm	2010	2075	Link
Maryland Oil Palm Plantation	Oil Palm	2011	2036	Link
Cavalla Rubber Corporation	Rubber	2011	2061	Link

4.6. State participation in the extractive industries

Requirement 2.6 of the EITI Standard requires that the government and state-owned enterprises should disclose their shareholding in oil, gas and mining companies operating within the country, and any changes in the shareholding during the accounting period covered by the LEITI Report.

Requirement 4.5 of the EITI Standard states that: “The MSG is required to ensure that the reporting process comprehensively addresses the role of SOEs, including comprehensive and reliable disclosures of material company payments to SOEs, SOE transfers to government agencies and government transfers to SOEs”.

Requirement 6.2 of the EITI Standard states that: “Where state participation in the extractive industries gives rise to material revenue payments, implementing countries must include disclosures from SOEs on their quasi-fiscal expenditure. The MSG is required to develop a reporting process with a view to achieving a level of transparency commensurate with other payments and revenue streams and should include SOE subsidiaries and joint ventures”.

4.6.1. State participation in the mining sector

State-Owned Enterprises (SOEs) in the mining sector

We were not informed of any SOE operating in the mining sector in Liberia during the reporting period.

Government ownership in companies’ equity operating within the mining sector

Section 9.22 of the Mining and Minerals Law 2000 provides that “Government shall receive free of charge an equity interest in all Class A Mining Operations as defined in Chapter 6 of the Act, equal to but not less than ten percent (10%) or not more than fifteen percent (15%) of its authorized, issued and outstanding share capital existing at any time and from time to time without dilution”.

Based on the terms of the relevant MDAs between the Government and the operating mining companies in Liberia, the government’s equity shareholding as confirmed by the MME is detailed the table below:

TABLE 60: GOVERNMENT OWNERSHIP IN MINING COMPANIES’ EQUITY

MDA	Year	Government ownership in companies’ equity
Arcelor Mittal	2005	<p>According to Article 16 of the MDA, the initial stated capital of the Concessionaire should be (US\$ 10,000), divided in Ten Thousand (10,000) shares of per value US\$ One (1) each, as follows:</p> <ul style="list-style-type: none">- The Principal: 70%- The Government 30%. <p>Between the effective date and the commercial operation startup date, the other shareholders shall contribute to a cash amount of US\$ 35,000,000, while the Government shall contribute in-kind:</p> <ul style="list-style-type: none">- The Class A mining license

MDA	Year	Government ownership in companies' equity
		<ul style="list-style-type: none"> - Assets and facilities detailed in appendix F to the MDA worth US\$ 15,000,000. <p>As such, the total share capital of the company shall amount to US\$ 50,010,000 detailed as follows:</p> <ul style="list-style-type: none"> - The Principal: US\$ 35,007,000 - The Government: US\$ 15,003,000
Bea Mountain	2001	<p>According to Section 33 of the 2010 amendment to the MDA: "Government shall receive free of charge, an equity interest in the operator's operations equal to 10% of its authorized share capital, issued from time to time, without dilution. Dividends to shareholders will be payable only once all the project capital investment and any related loan interest have been fully recovered."</p> <p>The MDA did not provide further details regarding the State participation in the company.</p>

The mining companies selected to report Government ownership disclosed the following:

TABLE 61: GOVERNMENT OWNERSHIP IN THE MINING COMPANIES DURING THE REPORTING PERIOD

Company	Government ownership FY 2023	Government ownership FY 2021/22	Change
Arcelor Mittal	15.00%	15.00%	0.00%
Bea Mountain	0.00%	0.00%	0.00%

Although the Liberia Minerals and Mining Law 2000 requires the receipt by the government of an equity interest of 10% to 15% in all class A mining licenses, the MDAs published do not provide for such, except for the two companies presented in the table above.

Dividends

The reporting templates submitted by government agencies and mining companies did not indicate any dividends paid by the mining companies to the Government during the reporting period.

Loans or loan guarantees

The reporting templates submitted by government agencies and mining companies did not indicate any loans or loan guarantees provided by the government to the mining companies during the reporting period.

4.6.2. State participation in the oil and gas sector

State-Owned Enterprises (SOEs) in the Oil and Gas sector

The only SOE operating in the oil and gas sector in Liberia is the National Oil Company of Liberia (NOCAL) that was established in April 2000 by Liberia's National Legislature.

The NOCAL's mission consists of "holding all of the rights, titles and interests of the Republic of Liberia in the deposits and reserves of liquid and gaseous hydrocarbons within the

territorial limits of the Republic of Liberia, whether potential, proven, or actual, with the aim of facilitating the development of the oil and gas industry in the Republic of Liberia.”⁶⁵

NOCAL is expected to be subjected to and complies with Liberia’s Public Financial Management Act, with respect to financial reporting requirements, rules governing the maintenance of funds and application of surplus funds, borrowing and issuance of guarantees, accounts and audits, and the preparation of budgets, including multiyear budgets and expenditure approvals.

The activities of NOCAL are predicated on four main bases according to the Petroleum Act (2014). The corporation is established as a commercial entity for the purposes of:

- (i) According to the 2014 Petroleum Act, NOCAL activities are organized around petroleum operations and petroleum transportation system operations, either alone or in conjunction with others;
- (ii) Promoting exploration, ensuring that Liberia’s petroleum resources are developed in a way that is orderly and well-planned, and ensuring that Liberia benefits as much as possible from the development of its petroleum resources;
- (iii) Ensuring that Liberians, particularly young people, receive training in all aspects of petroleum operations to strengthen national capabilities; and
- (iv) Aiding in capacity building and human resource development to enable the company to get ready for commercial activities involving the exploration and production of petroleum products with a view to creating an international oil and gas company that explores and produces.

NOCAL also chairs the Hydrocarbon Technical Committee (HTC) - the inter-ministerial body created by the 2002 Petroleum Law which is empowered to negotiate all contracts.

During last few years, NOCAL has entered into a vigorous seismic data promotion and marketing campaign to stimulate new exploration and to ensure that companies holding oil exploration blocks work up to their programs promptly. This program includes data studies followed by detailed 3D seismic, which led to the identification of drillable structures and the exploratory drilling program.

Governance of NOCAL

NOCAL is governed by the Board of Directors that oversees the general policies, oversight and direction of the affairs of the corporation. The Board of Directors shall be composed of at least three members without exceeding seven members as determined in the by-laws of the corporation. Five directors were initially appointed, while the Minister of Finance and Development Planning (MFDP) and the Minister of Lands, Mines and Energy act as ex officio members of the Board of Directors.

Capitalisation

NOCAL is a wholly owned State Corporation as stated in Section 4 of the NOCAL Act 2014.⁶⁶ According to Section 8 of the Act, NOCAL is authorized to issue a maximum of one hundred (100) shares of stock, all of which shall be of no-par value and shall be owned by the State.

⁶⁵ Source: NOCAL’s website <http://www.nocal.com.lr/>

⁶⁶ <http://www.nocal.com.lr/operations/New%20Petroleum%20Law/New%20Petroleum%20Law/petroleum-law>

NOCAL shall have an initial stated capital of US\$ 250,000. The President is authorized to provide in the National Budget for an increase in the capital of the corporation from time to time, as may be deemed necessary. Such amounts shall be paid to NOCAL by MFDP as approved in the National Budget and in the manner provided by law.

Income

In respect to Section 8 of NOCAL Act 2014, the funds of NOCAL shall consist of:

- fees and commissions earned on account of its marketing activities;
- revenues derived from the State's participating interests held and managed by NOCAL;
- amounts received in connection of managing data obtained pursuant to licenses and made available to LPRA;
- amounts transferred to NOCAL by LPRA in connection of holding and managing, on behalf of the State and all participating interests acquired by the State in petroleum agreements;
- loans obtained; and
- any other income derived by NOCAL from its commercial activities.

As there is no production of oil and gas currently, NOCAL collects only other payments made by oil and gas companies as required by some contracts (not all): Surface Rentals, Annual License fees, Renewable Energy Funds, Annual training, contribution to Hydrocarbon Development Funds and other contributions. These contributions are transferred by NOCAL to LRA.

According to NOCAL and LRA reports, no transfers were made to LRA during FY 2023.

In terms of income, NOCAL received an amount of US\$ 1,000,000 from the sale of seismic data.

Financial relationship between NOCAL and GoL

The financial relationship between the NOCAL and the GoL involves government ownership, revenue sharing, regulatory oversight, joint ventures, and contributions to the national budget. As such, all amounts due to the State on account of its share of production, either received in cash from the contractor or otherwise received from the sale of production taken in kind, less any fees or commissions due to NOCAL, shall be deposited into the Consolidated Fund.

NOCAL typically plays a key role in managing Liberia's oil and gas sector, and the government benefits from this partnership through various financial mechanisms. Revenue generated from the oil and gas sector supports the national budget and government programs, with the specificities of the relationship subject to change based on evolving agreements and regulations.

Dividends policy

Section 8 (f) and (g) of the NOCAL Act 2014 previews the dividends policy applicable to NOCAL as follows:

“At such time as NOCAL has funds available in excess of 110% of its unspent amount from its approved budget for the current fiscal year plus the lesser of its total approved budget for the current fiscal year and the amount of its approved budget for the following fiscal year (if such budget then exists), it shall transfer to LRPA in support of its regulatory responsibilities such amounts as are deemed necessary to result in the latter holding funds equal to the unspent amount of its approved budget for the current fiscal year plus the lesser of its total approved budget for the current fiscal year and the amount of its approved budget for the following fiscal year (if such budget then exists).

NOCAL shall declare and pay dividends only at such time as no amounts are transferrable to LRPA and shall respect the following provisions:

- the Board of Directors shall declare and pay dividends to the State in accordance with a dividend policy set by the President;*
- the dividend policy shall ensure that the retained earnings of the corporation shall be sufficient to cover known and reasonably anticipated financial requirements of the corporation as set forth in the current approved budget of the corporation and shall ensure that dividends are paid to the State; and*
- all dividend payments shall be made directly into the Consolidated Fund.”*

According to NOCAL and other government agencies, there were no dividend payments made to Government during the reporting period FY 2023.

Tax payments to GoL

Paragraph 14 (b) of the NOCAL Act (2014) states that NOCAL shall be subject to law of general application in accordance with LRC.

According to LRA and NOCAL confirmations, there were no tax payments made by NOCAL to LRA during the reporting period FY 2023.

NOCAL's Audited Financial Statements

Section 14 (d) of the NOCAL act 2014 states that in addition to any audits which the Auditor General may conduct of the books and accounts of the corporation, the annual financial statements of the corporation shall be audited by a reputable international accounting firm.

The same Act states in its Section 14 (e) that the audited financial statements of NOCAL and the audit report shall be published on NOCAL's website and published in at least two national newspapers within 90 days of their delivery to NOCAL.

NOCAL has confirmed that its accounts have not been audited during the reporting period FY 2023.

The last publicly available audited Financial Statements of NOCAL cover the FY 2019/20 and used to be published on GAC website. However, the audited financial statements for the subsequent fiscal years, from 2020/21 to date, are not publicly available or communicated by NOCAL during the reporting process.⁶⁷

⁶⁷ <https://www.nocal.com.lr/reports>

The LEITI secretariat provided us with a draft special audit report conducted by the Internal Audit Agency covering the period from 1st January 2024 to 31 January 2025. The major findings raised in the report are as follow:

- No minutes from meetings of senior management from January 2024-January 31, 2025;
- US\$ 119,114 and LRD 2,830,000 disbursed as corporate social responsibility to entities without supporting documentation;
- LRD 1,900,000 disbursed as salary advance without evidence of recovery;
- US\$ 27,440 disbursed through credit card without supporting documents;
- US\$ 3,177 charged to credit card for gambling activities and personal purchases;
- LRD 12,276 and US\$1,050 in bank charges to inactive accounts held with SI Bank, Ecobank, and LBDI;
- US\$ 20,000 on multiple disbursement to staff without supporting evidence;
- Inconsistent Authorizations/Approvals of Payment Vouchers among the CEO, Vice President for Finance and comptroller;
- US\$ 164,050 in multiple disbursements for consultancy without evidence of work done;
- Anomalies noted including breach of contract with a potential loss of US\$ 179,093 in the Construction Project of NOCAL's Proposed Headquarters; and
- The audit of NOCAL's financial statements revealed the following: variance between financial statement and notes, misclassification of Inventory, issues with disclosure and measurement of accounts receivable, etc.

Shares in oil and gas companies

In the oil and Gas sector, the State is entitled to 10 percent free interest under all Petroleum Agreements. In addition to this, the State has the right to acquire additional 5 percent citizen participation managed by NOCAL.

As of the reporting period, NOCAL has no shares in any oil company.

Quasi-fiscal expenditure

The LEITI MSG has agreed that any public social expenditure such as payments for social services, public infrastructure, fuel subsidies and national debt servicing, etc. made by NOCAL i.e. outside of the national budgetary process is regarded as quasi-fiscal expenditure.

However, NOCAL did not declare such expenditure during FY 2023.

State interests in the petroleum agreements (participation in oil & gas projects as a partner)

Section 35 of the new petroleum Law 2014 states that the State shall have the right to acquire through NOCAL a participation in the rights and interests of a contractor under a petroleum agreement in a percentage specified in the petroleum agreement, but which shall not be less than 10%.

The participation option is to be exercised by the Minister of Finance and Development Planning upon recommendation of LRPA and NOCAL, by written notice to the contractor given within the time provided in the relevant petroleum agreement.

HTC has the power, under the chairmanship and guidance of the President/CEO of NOCAL to negotiate and conclude agreements with all applicants for hydrocarbon development and exploitation rights and such related permits. The agreement so negotiated and concluded, becomes effective and binding upon the parties and the Republic of Liberia, when signed by the applicants, NOCAL, the Minister of Finance, the Minister of Lands, Mines and Energy, the Chairman of the National Investment Commission, attested by the Minister of Justice and approved by the President of Liberia.

Any State participation acquired pursuant to Section 35 shall be carried out by the contractor until the start of commercial production, which means that:

- all exploration, appraisal and development costs shall be paid by the contractor;
- the State, through NOCAL, shall pay its participating interest share of all costs of carrying out production operations, and
- the non-State participants comprising the contractor shall be entitled to recover the State's participating interest share of all or part of the exploration, appraisal and development costs of the field in question, with or without interest thereon, all under the terms and subject to such conditions as shall be specified in the petroleum agreement.

The State participation then acquired pursuant to Section 35 shall be managed by NOCAL, becoming thus a party to the petroleum agreement under the terms of a joint operating agreement between NOCAL and the other entity or entities comprising the contractor.

As such, the Liberian government has participation in the PSCs through its SOE, NOCAL. The latter has a share in the remaining Oil production (Total production of oil Crude -recovery of the Petroleum costs).

Government's share in the petroleum companies

The Petroleum Act of Liberia 2014 does not provide for shares in the petroleum companies to be held in petroleum companies.

The GoL does not hold any shares in petroleum companies during FY 2023.

State interests in the petroleum agreements

The 2002 Petroleum Law provides the legal basis for the State participation in the oil and gas sector. The State is entitled to a 20% charge-free equity interest in all Petroleum Agreements. In addition to this, the State has the right to acquire an additional 10% citizen participation, managed by NOCAL.

4.6.3. State participation in the forestry sector

State-Owned Enterprises (SOEs) in the forestry sector

We understand that there were no SOE operating in the forestry sector in Liberia during the FY 2023.

The FDA is a state corporation pursuant to the Public Authorities Law that was established by an Act of legislature in 1976. This law, alongside with the National Resources Law 1979, the National Forestry Reform Law 2006 and the concession agreements with the forestry sector companies operating in Liberia do not provide for a share of ownership to be attributed to the FDA in these companies' shareholders equity.

Financial Relationship between the FDA and Government

The financial relationship between the FDA and the GoL involves government ownership, revenue sharing, regulatory oversight, and contributions to the national budget. The FDA, as the governing body responsible for managing Liberia's forests, generates revenue through activities such as timber concessions and fees.

A portion of this revenue is typically shared with the government, contributing to the national budget and funding various government programs and services. Additionally, the FDA exercises regulatory oversight by setting and enforcing regulations related to forestry management.

The specifics of this financial relationship may evolve based on changing agreements and regulatory frameworks.

FDA dividend policy

The forestry sector doesn't have a dividend policy. However, the dividend policy of the forestry sector is determined by the government policies and the financial performance of the Authority. These policies may prioritize reinvestment of profits into the sector's development or other government programs.

State ownership in forestry companies or interests in forestry contracts

The National Forestry Reform Law 2006 does not mention any state participation in forestry companies' equity or interests when contracts are concluded. It is understood that the State does not have any equity interest in forestry concessions.

4.6.4. State participation in the agriculture sector

State-Owned Enterprises in agricultural sector

There are no SOE operating in the agricultural sector in Liberia during the reporting period.

State ownership in agricultural companies or interests in agricultural agreements

The applicable legislation does not require state participation in agricultural companies' equity nor interest in the agricultural contracts.

In addition, the concession agreements made with the agriculture sector companies operating in Liberia did not provide for any shares held by the government in those agricultural companies.

4.7. Collection and Distribution of Extractive Revenues

In accordance with Requirement 5.3b of the EITI Standard, the Multi-Stakeholder Group is encouraged to disclose information of the country's budget and audit processes and links to the publicly available information on budgeting, expenditures and audit reports.

This section presents information on the Budget Process including Budget execution and oversight, Revenue Collection and Allocation, Accountability and Reporting of Revenues from the extractive sector.

4.7.1. Budget Process

The budget process in Liberia is supported by a legal and regulatory framework :

- [The Public Financial Management \(PFM\) Act of 2009](#), coupled with
- [The Medium-Term Expenditure Framework \(MTEF\) Budgeting Manual](#).

The Public Financial Management Act of 2009 represents the legal framework for reforming the institutions and processes involved in the financial and economic governance of Liberia.

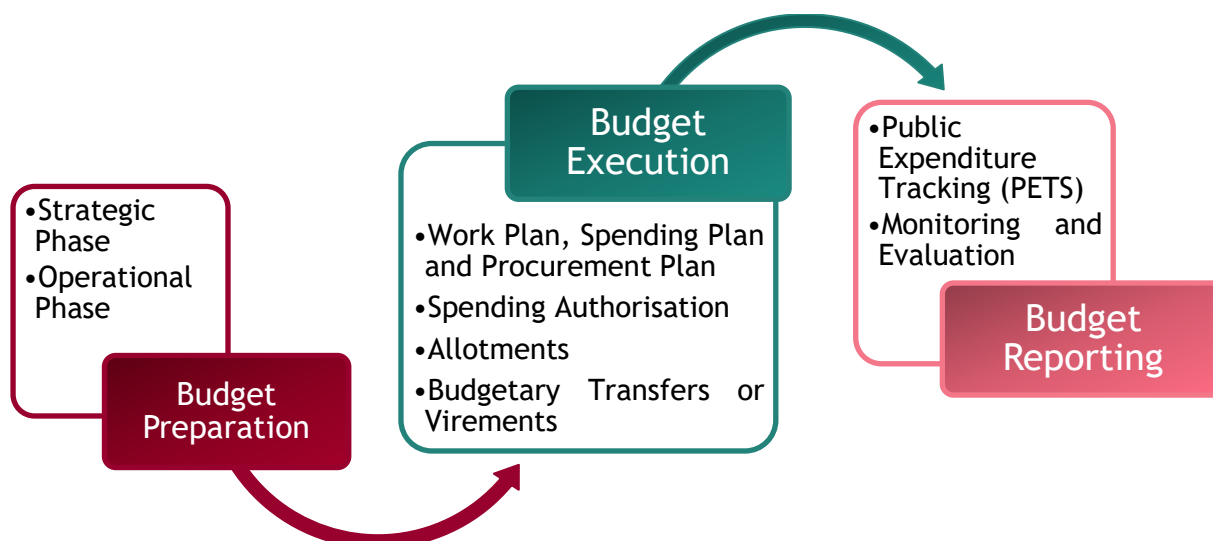
Section 8.1 of the PFM Law of 2009 and its implementing regulations require that the national budget be prepared “in the context of a medium-term fiscal framework for the purposes of achieving national objectives over a multi-year period”.

This MTEF Budgeting Manual details the processes and sub-processes, institutional responsibilities, and relevant authorities for implementing that mandate.

The budget cycle

The MTEF budget process comprises the following three main phases:

FIGURE 23: LIBERIA’S BUDGET CYCLE



Budget Preparation

The overall purpose of the budget preparation phase is to produce a National Budget which is policy focused and allocates scarce resources in the most efficient and effective way.

There are two phases of the MTEF budget preparation process:

- **Strategic phase:** the overall purpose is to work on policies: Both fiscal policy and service delivery policy and priorities.
- **Operational phase:** the overall purpose is to develop detailed budgets for each spending entity based on agreed priorities during the strategic phase.

We present in the table below the different activities and outputs required, timelines and responsibilities for each phase of the budget preparation process according to the MTEF Budgeting Manual:

TABLE 62: BUDGET PREPARATION PHASES, ACTIVITIES AND TIMELINES

N°	Activity	Deadline	Responsible party
Strategic Phase			
1	Revenue estimates (Medium Term Fiscal Framework); and Project Projections and Spending Review.	Quarter 2 October	- Department of Economic Management (DEM); - Department of Budget & Development Planning (DBDP); - Liberia Revenue Authority (LRA); and - Legislative Budget Office as observer.
2	Updating Sector Strategies.	Quarter 2 October	- DBDP; and - Sector Working Groups and spending entities.
3	Budget Options Paper (BOP) reflecting sector strategies derived from BFP for Cabinet meeting and approval.	Quarter 2 November	- DEM; - Budget Working Group (BWG); and - Finance Minister/Cabinet.
4	Budget Call Circular 1 - guidance to Spending entities on preparing strategic budget submissions.	Quarter 2 November	- DBDP.
5	Spending entities prepare Budget Policy Notes (PBNs) in line with guidance in Budget Call Circular 1.	Quarter 2 December	- Spending entities Budget Committees.
6	Cabinet approval of the first draft of Budget Framework Paper informed by BPNs and Sector Strategies.	Quarter 3 February	- DEM; - BWG; - DBDP; and - Finance Minister/Cabinet.
7	Presentation to Legislature of the Budget Framework Paper (BFP).	Quarter 3 February	- Finance Minister/National Legislature.
Operational Phase			
1	Budget Call Circular 2 - guidance to spending entities on preparing detailed budget submissions.	Quarter 3 February	- DBDP.
2	Spending entities prepare detailed Budgets in line with guidance in Budget Call Circular 2.	Quarter 3 March	- Spending entities Budget Committees.
3	Budget Hearings (Executive).	Quarter 3 March	- DBDP; - Finance Minister - National Budget Committee (NBC); and - Spending entities.
4	Draft Budget Book and final BFP prepared based on decisions from Budget Hearings	Quarter 4 April	- DBDP; and - DEM.
5	Presentation of Draft Budget and BFP to Cabinet and the President.	Quarter 4 April	- Deputy Minister DBDP; and - Finance Minister.
6	Presentation of Draft Budget and BFP to the Legislature.	Quarter 4 30 th April	- Finance Minister; and - President.

Budget Execution

At the start of each budget year, budget execution takes a central stage in the budget process. This is when the strategic plans and priorities defined during the strategic phase and translated into budget allocations during the operational phase must be implemented.

The table below gives an overview on the main activities related to the budget execution process according to the MTEF Budgeting Manual:

TABLE 63: BUDGET EXECUTION MAINS ACTIVITIES

Activity	Description
Work Plan, Spending Plan and Procurement Plan	Spending entities are required to submit an outline of the activities to be undertaken during the fiscal year, segmented by quarters into a comprehensive plan covering all of the activities articulated in their BPNs and reflected in the approved Budget. The completion of a procurement plan has been integrated with the budget process. The procurement plan must be submitted to the Public Procurement and Concessions Committee, and once approved, be forwarded to the Department of Budget & Development Planning.
Spending Authorization	Following approval of the Budget, the President is required to issue a formal authorization to the Minister for the release of funds through the warrant process. If the budget is not approved by the National Legislature by 1st July, then the Department of Budget & Development Planning is authorized to make allotments for each month based on the previous year's budget until the budget is approved.
Allotments	Allotments are authorizations for spending entities to access their budget. The DBDP makes allotments ideally on a quarterly basis, based on the spending plans that the spending entities have submitted and cash availability. Once these allotments are issued, the spending entities can request the release of funds from the Department of Fiscal Affairs.
Budgetary Transfers or Virements	Budgetary transfer or Virement is an authorized alteration in budget appropriation after the Legislature has approved the National Budget. Since the budget is a dynamic instrument, unforeseen changing circumstances may necessitate changes to budgetary appropriations after the budget is approved. These budget reallocations or virements are permitted if they are approved by the Deputy Minister of Budget or for inter-ministry transfer, approved by the National Legislature.

Budget Reporting and Accountability

An important characteristic of the MTEF process is to increase the results focus of the budget. By reporting on budget performance there is increased transparency and accountability on how public resources have been utilized to deliver services.

We present in the table below, an overview of the required activities related to the budget reporting and accountability process according to the MTEF Budgeting Manual:

TABLE 64: BUDGET REPORTING AND ACCOUNTABILITY MAINS ACTIVITIES

Activity	Description
Reporting Requirements	The DBDP will analyze progress made in project performance against the funds utilized. The semi-annual budget performance report will provide an indication of past performance. This will be used to inform budget decision-making for the

Activity	Description
	<p>forthcoming financial year. Spending entities are required to disclose information concerning commitments on major capital projects.</p> <p>The DBDP and the Department of Fiscal Affairs will develop a standard reporting tool or template to be used by all spending entities and sectors to ensure consistency in reporting.</p>
Public Expenditure Tracking (PETS)	<p>PETS' findings and recommendations are meant to enhance Accountability and transparency in the use of public resources and to ensure that the resources do reach the intended beneficiaries.</p> <p>Good practice requires that the conduct of PETS be outsourced to an independent researcher, knowledgeable in PETS methodology and capable of undertaking the assignment.</p> <p>The PETS findings should be shared with as many stakeholders as possible, not just within the MFDP.</p>
Monitoring and Evaluation	<p>Monitoring and Evaluation (M&E) are important components of the MTEF process. Monitoring must be employed to assess whether programs are being implemented according to the Monitoring & Evaluation Plan and per schedule. Evaluation must be conducted to assess the impact, efficiency, effectiveness and sustainability of these programs.</p>

Key budget documents are available electronically and are publicly available on the budget information website www.mfdp.gov.lr.

4.7.2. Revenue Collection

The National Budget is the Government's plan on how to collect and spend funds to deliver services to the citizens of Liberia. The budget starts on 1 July and ends the following year on 30 June. This is referred to as the fiscal year.

Revenue comes from different sources, such as taxes and borrowing from other countries. Pursuant to the Constitution of Liberia, the legislature is authorized: "to levy taxes, duties, imposts, excise and other revenues, to borrow money, issue currency, mint coins, and to make appropriations for the fiscal governance of the Republic." The LRA is the principal collector of taxes and the administrator of the Revenue Code. LRA collects taxes that account for about 90% of the revenue that supports the Government's operations.⁶⁸

Tax Administration System

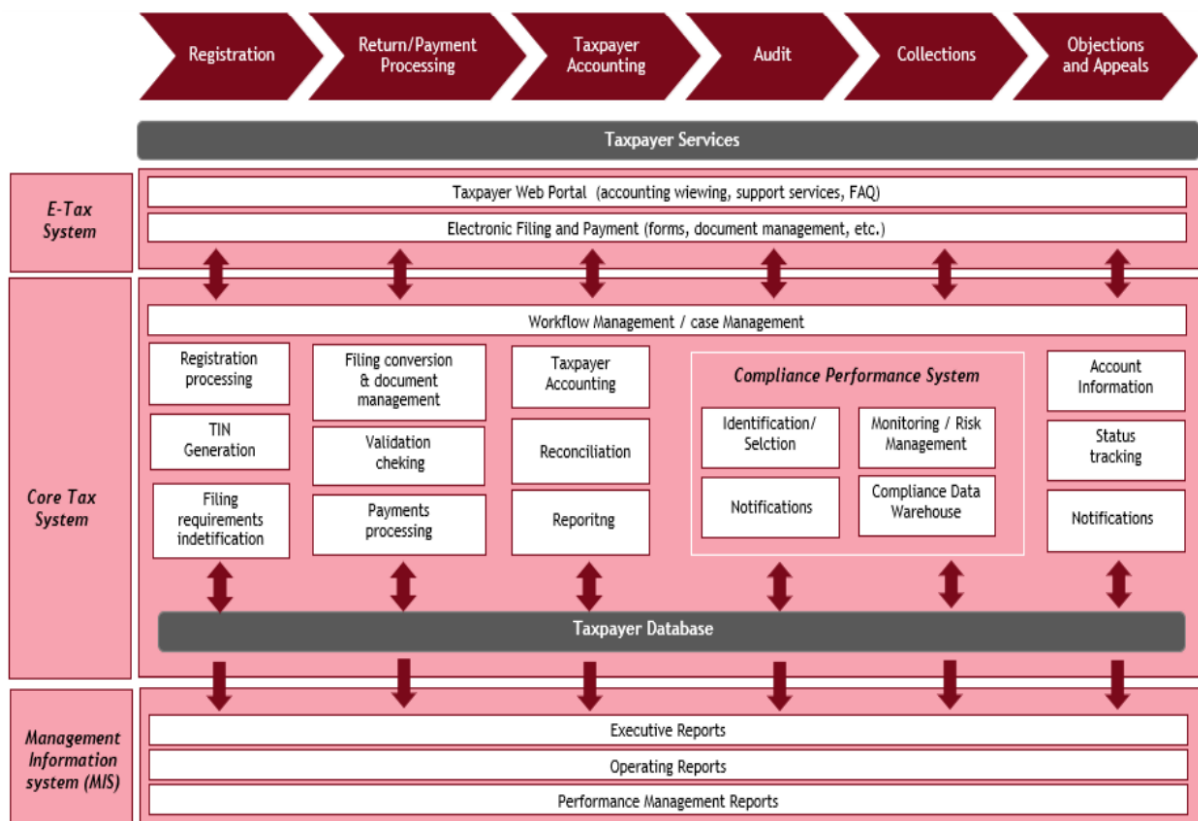
In June 2021, the LRA launched the implementation of the Integrated Tax Administration System (ITAS)⁶⁹ The new tax system which is inclusive of online registration, online filing and payment among others, will replace the Standard Integrated Government Tax System (SIGTAS) currently used by the Authority.

The figure below presents the different types of ITAS support to each of the tax administration's functions:

⁶⁸ <https://revenue.lra.gov.lr/about>

⁶⁹ <https://liberianewsagency.com/2021/06/22/lra-launches-itas-project-for-tax-payers/>

FIGURE 24: ITAS SUPPORT TO TAX ADMINISTRATION FUNCTIONS⁷⁰



Revenue allocation and transfers

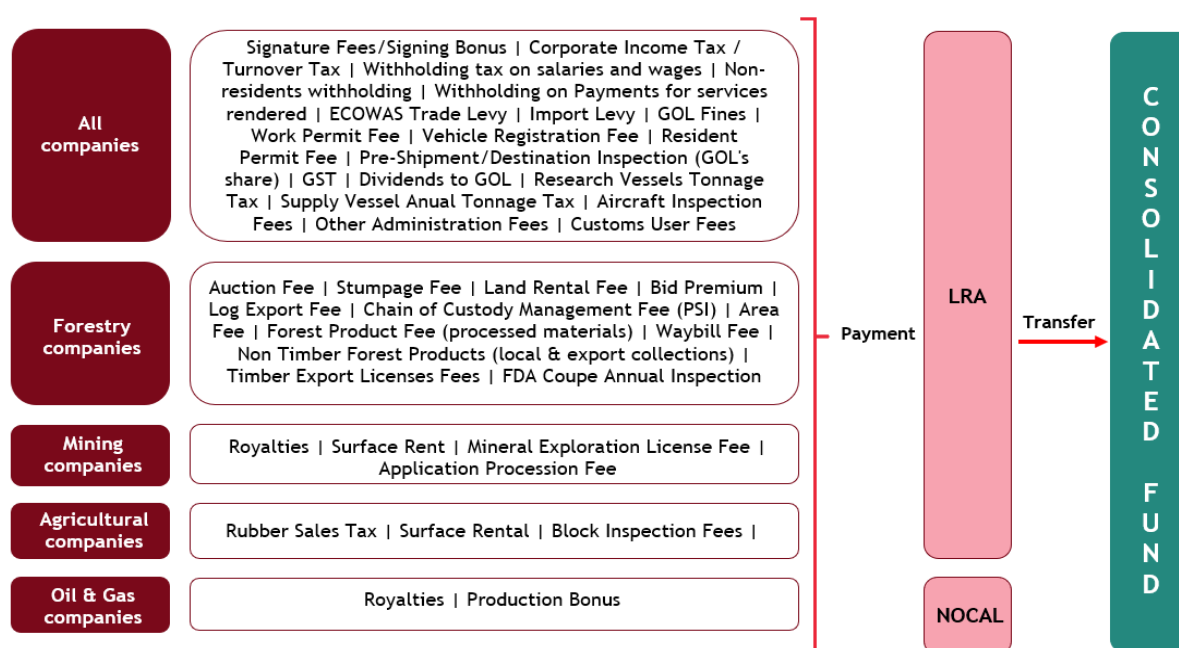
Section 26 of the LRA Act, stipulates that the revenue collected by the LRA shall be paid into the Consolidated Fund. The Finance and accounts unit of the FDA collects fees for timber and non-timber forest products and deposits same into government revenue account.

As part of the provisions in the PSCs, NOCAL receives funds from Oil Companies then remits them to the Government and other institutions such as the University of Liberia and MME.

The figure below sets out the extractive revenue collection framework:

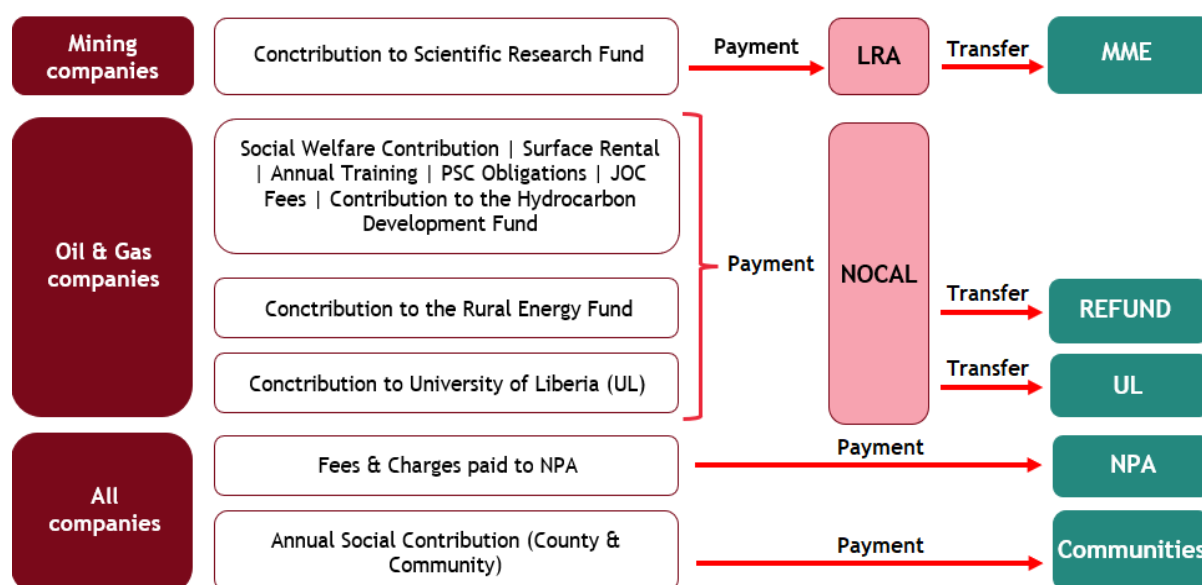
⁷⁰ https://pdf.usaid.gov/pdf_docs/pnaea485.pdf

FIGURE 25: EXTRACTIVE REVENUE COLLECTION DIAGRAM



The figure below sets out the Off-budget extractive revenue collection framework.

FIGURE 26: OFF-BUDGET EXTRACTIVE REVENUE COLLECTION DIAGRAM



4.8. Infrastructure and barter arrangements in the Extractive Sector

EITI Requirement 4.3 states that it should be considered whether there are any agreements or sets of agreements involving the provision of goods and services (including loans, grants and infrastructure works), in full or partial exchange for oil, gas or mining exploration or production concessions or physical delivery of such commodities.

None of the reporting entities declared any agreements nor sets of agreements involving the provision of goods and services (including loans, grants and infrastructure works, in full or partial exchange for mining exploration or production concessions or physical delivery of such commodities.

4.9. Transportation revenues

EITI Requirement 4.4 states that “Where revenues from the transportation of oil, gas and minerals are material, the government and SOEs are expected to disclose the revenues received by government agencies”. The EITI Standard requires disclosure of details of arrangements in situations where Government Agencies and state-owned enterprises are involved in the transportation of oil, gas and minerals. These details include the product(s) transported, route(s) and the relevant companies and government agencies, including SOE(s), involved in transportation.

None of the government agencies nor SOEs included in the reporting scope declared transportation revenues collected by the GoL during the period from 1 January to 31 December 2023.

4.10. Subnational payments

EITI Requirement 4.6 states that: “It is required that the MSG establishes whether direct payments, within the scope of the agreed benefit streams, from companies to subnational government entities are material. Where material, the multi-stakeholder group is required to ensure that company payments to subnational government entities and the receipt of these payments are disclosed.”

None of the extractive companies included in the reconciliation scope declared direct payments to sub-national government agencies during the period from 1 January to 31 December 2023.

4.11. Sub-national transfers

EITI Requirement 5.2 states that: “Where transfers between national and subnational government agencies are related to revenues generated by the extractive industries and are mandated by a national constitution, statute or other revenue sharing mechanism, the MSG is required to ensure that material transfers are disclosed. Implementing countries should disclose the revenue sharing formula, if any, as well as any discrepancies between the transfer amount calculated in accordance with the relevant revenue sharing formula and the actual amount that was transferred between the central government and each relevant subnational entity.”

None of the government agencies included in the reporting scope declared transfers between the central government and sub-national government agencies that are related to revenues generated by the extractive sector during the period from 1 January to 31 December 2023.

4.12. Beneficial ownership (BO)

The EITI Standard recommends that implementing countries maintain a publicly available register of the beneficial owners of the corporate entity(ies) that apply for or hold a participating interest in an exploration or production oil, gas or mining license or contract, including the identity(ies) of their beneficial owner(s), the level of ownership and details about how ownership or control is exercised.

In 2021, Liberia signed up to the Opening Extractive Program (OEP), a program implemented by the International EITI Secretariat and Open Ownership. OEP is intended to assist Liberia to implement a BO regime that discloses high quality and accurate information; enhance the access to and use of BO information. OEP has conducted an [initial scoping report](#) that examines the state of play of BO reforms in Liberia. It aims to identify specific gaps in BO implementation and make context-specific recommendations on how Liberia can advance beneficial ownership reforms.

The following updates have been made for the BO implementation in Liberia under the OEP program:

- Completion of a BO scoping study for Liberia.
- Completion of a BO Decision Document that elaborates the key aspects of BO implementation including thresholds, definition of Politically Exposed Persons (PEP), information to collect from each beneficial owner, among others.
- Completion of a stakeholder consultation session on BO regulations.
- Completion of BO draft regulations and stakeholder consultations as well as BO draft forms and guidance notes.
- Adoption of the new Beneficial Ownership Regulations in August 2023 which require companies to disclose information about their beneficial or ultimate owners in a new central register, including names, addresses, and ownership stakes.
- Launch of a new Digital Beneficial Ownership Register in September 2023.

4.12.1. Current legislations relating to the Beneficial Ownership disclosure in Liberia.

Liberia has introduced several laws and regulations that provide the framework for BO disclosure. These legal instruments set out requirements for companies, financial institutions, and extractive sector operators to report information on their beneficial owners, with the aim of improving transparency and compliance with international standards.

The main legislation and regulations are outlined in the table below, showing their key provisions on BO disclosure and the entities to which they apply

TABLE 65: CURRENT LEGISLATIONS RELATED TO THE BO DISCLOSURE IN LIBERIA

Legislation	Key Provisions on Beneficial Ownership (BO) Disclosure
Associations Law of Liberia (Title 5, 2020)	Requires domestic companies, partnerships, trusts, and foundations to disclose information about their beneficial or ultimate owners to the Liberia Business Registry (LBR).

Legislation	Key Provisions on Beneficial Ownership (BO) Disclosure
Petroleum (Exploration and Production) Act (2014) and as Amended in 2019	Companies applying for petroleum licenses must provide details of directors, shareholders, and beneficial owners and report any material changes. Petroleum agreements and licenses require regular reporting on beneficial owners and controlling persons.
Anti-Money Laundering (AML/CFT) Regulations (2013)	Require financial institutions and designated non-financial businesses to verify BO information, particularly for high-risk clients such as extractive companies.
LEITI Act (2009)	Provides LEITI with the mandate to collect and publish information on beneficial owners as part of its transparency requirements.

These frameworks provide the legal basis for BO disclosure; however, enforcement and systematic reporting mechanisms have been progressively strengthened in recent years.

4.12.2. Liberia's legal reforms on Beneficial Ownership disclosure

In August 2023, Liberia adopted new [BO regulations](#) which require companies to disclose information about their beneficial or ultimate owners in a new central register, including names, addresses, and ownership stakes.

The purpose of this regulation is to provide for the basis for the application of matters on beneficial ownership disclosure as prescribed by the Associations Law of Liberia, Title 5. Specifically, this Regulation provides the basis for the collection, processing, verification, publication, and accessibility to the information of beneficial owners of all entities that are created, organized, registered, or incorporated under the laws of the Republic of Liberia as well as foreign entities, businesses and companies that are authorized to do business within Liberia. The Regulation also prescribes sanctions for non-compliance.

This regulation applies to all forms of domestic entities and/or organized under the laws of Liberia, inclusive of:

- domestic corporations,
- domestic limited liability companies,
- partnerships,
- limited partnership,
- trusts,
- foundations, and
- other legal entities organized under the laws of Liberia.

Definitions adopted

The new BO regulation defines the Beneficial Owner and the Politically Exposed Person (PEP) as follows:

TABLE 66: BENEFICIAL OWNER AND PEP DEFINITIONS ACCORDING TO THE NEW BO REGULATIONS

Term	Definition adopted
Beneficial Owner ⁷¹	<p>A “Beneficial Owner” refers to:</p> <ul style="list-style-type: none"> - the natural person(s) who ultimately owns or controls or exercises ultimate effective control over a legal person or arrangement; - where no natural person exerts control through ownership interests, the natural person(s) exercising control of the legal person through other means, such as control through relationships, financial power or contractual associations; and - where no natural person meets the criteria above, the relevant natural person(s) who holds the position of senior managing officer.
Politically Exposed Person (PEP)	<ul style="list-style-type: none"> - PEP means any person who is or has been entrusted with a Prominent Public Function in Liberia or in any foreign country. - A PEP includes but is not limited to, a head of state or head of government; a senior politician; a senior government; judicial or military official; a director or officer of a State-Owned Enterprise; a senior political party official member of a state’s legislature, senate or other parliamentary body ; or any person who is entrusted with prominent functions by any international organization, such as members of senior management, directors, deputy directors, and members of the board, or other equivalent positions. - An individual is considered a PEP pursuant to this Regulation for at least five years after the date the individual ceases to hold the position that rendered him or her a PEP.

Thresholds adopted

The disclosure of beneficial ownership information by the Beneficial Owner and the Reporting Entity according to new beneficial ownership regulations are based on the following thresholds:

TABLE 67: DISCLOSURE OF BO INFORMATION THRESHOLDS ACCORDING TO THE NEW BO REGULATIONS

N°	Thresholds
1	A direct or indirect ownership interest of at least 5% in a Reporting Entity where the beneficial owner is the ultimate shareholder.
2	A direct or indirect controlling interest of at least 5% voting rights in a reporting entity where the Beneficial Owner is the ultimate shareholder or otherwise has the ability or power to exercise at least 5% of the voting rights of that reporting entity.
3	A direct or indirect ownership interest of at least 5% in a reporting entity where the Beneficial Owner is a foreign PEP.
4	A direct or indirect ownership interest of 1% in a reporting entity where the Beneficial Owner is a domestic PEP.

Central Register of Beneficial Owners

The new beneficial ownership regulations require all reporting entities to keep a register of its beneficial or ultimate owners.

⁷¹ As defined in section 1.2(c) of the Business Corporations Act

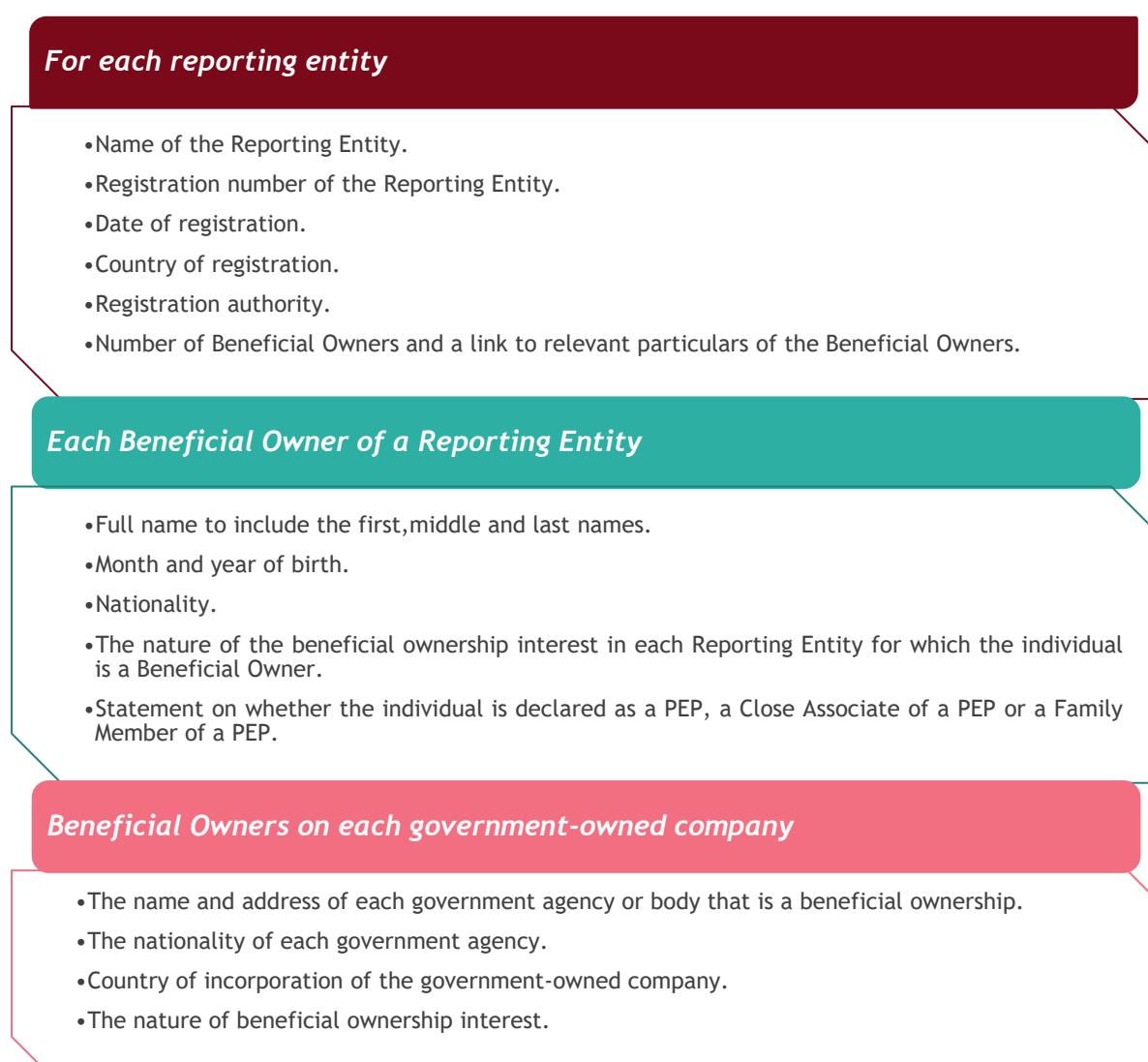
The Registry shall compile the beneficial ownership information submitted by reporting entities into a Digital Central Register, including names, addresses, and ownership stakes.

Details of the BO information that must be included in the central register of beneficial owners, for each reporting entity, natural person, or SOE, are detailed in section 2.6 of the new BO regulation.

Access to the Central Register of Beneficial Owners

The below figure shows the information that must be publicly available in the Digital Central Register according to the new BO regulation:

FIGURE 27: PUBLICLY AVAILABLE BO INFORMATION ON THE CENTRAL REGISTER⁷²



Sanctions related to the disclosure of BO information

The table below shows the different sanctions related to the disclosure of BO information according to the new beneficial ownership regulations.

⁷² Section 2.7 of the new beneficial ownership regulations.

TABLE 68: SANCTIONS RELATED TO THE DISCLOSURE OF BO INFORMATION⁷³

Sanction	Description
<i>Sanctions for non-submission, late submission, and incomplete submission of BO information</i>	<ul style="list-style-type: none"> - <u>Reporting Entity</u>: US \$3,000 and not exceeding US\$ 5,000 and a daily penalty of US\$100 until the non-compliance is rectified. - <u>Beneficial Owner/ Declaring Person</u>: US \$2,000 and not exceeding US\$ 5,000 and a daily penalty of US\$ 100.00 until the non-compliance is rectified.
<i>Sanctions for Submission of False Declaration BO Information</i>	<ul style="list-style-type: none"> - <u>Reporting Entity</u>: fine of not less than US \$3,000 but not exceeding US\$ 5,000, or subject to withdrawal of the legal status of good standing, revocation of formation documents or license to operate, certificate to do business, or dissolution, or any combination of the penalties prescribed herein as the Court shall deem appropriate or commensurate to the gravity of the violation. - <u>Beneficial Owner/Declaring Person</u>: fine of not less than US\$ 2,000 but not exceeding US\$ 5,000, or a prohibition from acting in any capacity as a Beneficial Owner of any domestic Reporting Entity or foreign Reporting Entity authorized to do business in Liberia, or any combination of the penalties prescribed herein as the Court shall deem appropriate or commensurate to the gravity of the violation. The beneficial owner may also be subject to a term of imprisonment of not less than one year and not more than two years as determined by the court.

4.12.2. Progress made on the implementation of BO Transparency by LEITI

In addition to the legal framework, Liberia has taken several practical steps to operationalize and strengthen BO disclosure. These initiatives focus on making BO data more accessible, improving the quality and reliability of disclosures, and building the capacity of institutions and stakeholders to use the information effectively. Key developments include:

- Launch of the Digital BO Register: The register was launched on 29 September 2023 and became operational on 1 December 2023, providing public access to names, addresses, ownership stakes, and control information.
- Cabinet Approval of BO Register Workplan: On 13 August 2025, the Cabinet approved a comprehensive workplan for implementing and enforcing the BO Register, fulfilling key benchmarks under Liberia's IMF Extended Credit Facility (ECF) program⁷⁴.
- Collection and Integration of BO Information: Extractive companies are requested to submit BO information as part of annual LEITI reporting. Work is ongoing to integrate this information into LEITI's Data Portal and link it with the BO Register to enable automated and systematic disclosure.
- Collection via Liberia Business Registry (LBR): Domestic companies also submit BO information using Excel templates provided by the LBR.

⁷³ Section 4 of the new beneficial ownership regulations.

⁷⁴ <https://www.mfdp.gov.lr/index.php/media-center/press-release/cabinet-approves-workplan-for-beneficial-ownership-registry?tmpl=component&print=1&format=print>

- BO Transparency Workshop: On 14 November 2024, The Africa Center for Energy Policy (ACEP) and LEITI hosted a one-day workshop in Monrovia to train Liberian stakeholders on BO transparency and reporting⁷⁵.
- Verification and Assurance: Systems are being developed to cross-check BO declarations against other sources, such as shareholder registries and tax records, to improve data reliability.
- Inter-Agency Coordination: The LBR, FIA, and LEITI collaborate to monitor compliance, enforce reporting obligations, and provide guidance to reporting entities.

These measures reflect Liberia's ongoing efforts to establish a robust and reliable framework for BO disclosure, supporting transparency, accountability, and good governance across the corporate and extractive sectors, even as full operationalization of the BO register is still underway.

4.12.2. Beneficial Ownership and Legal Ownership declaration

The companies selected in the LEITI reconciliation scope have been requested to make declarations on legal and beneficial ownerships in the reporting templates. Accordingly, the following information was requested:

- **Name of beneficial owner and nationality:** full name(s) of the company's beneficial owner(s) and information on their identity(ies) including:
 - Name of any politically exposed person where any owner is also a 'politically involved person', this should be mentioned.
 - Identifying details: additional details are required to narrow down a beneficial owner to one individual.
- **Contact:** details of the beneficial owner such as a business address.
- **Means of control:** a description of how the beneficial owner and any politically engaged persons exercises control over the company.
- **Signed statement of accuracy:** a senior official from the company should sign a statement to confirm that the information provided is accurate.

Details of legal and beneficial ownership of the companies within the scope of this report are presented in Annexes 3 and 4.

4.13. Auditing and accounting

To ensure that EITI data submitted by reporting entities is credible and of good quality, the LEITI MSG agreed to adopt the following approach with regards to the reporting process by Government Agencies and extractive companies included in the LEITI reporting process:

- the declarations made by companies and government agencies should be signed by an authorized senior officer (at management level) and an authorized senior official respectively;

⁷⁵ [*ACEP and LEITI Lead the Charge as Liberian Stakeholders Unite to Strengthen Beneficial Ownership Transparency*](#)

- the reporting templates submitted by the government agencies included in the reporting scope certified by the General Auditing Commission (GAC) who should agree with the government accounts for the reporting period 2023; and
- the reporting templates submitted by the extractive companies included in the reporting scope should be certified by an external auditor or the statutory auditor for each company; and
- all reporting entities selected in the reporting scope would be required to submit their audited financial statements for the reporting period 2023.

We set out below the assurance procedures in Liberia with regards to audits, as required by EITI Requirement 4.9.

4.13.1. Audit of private companies

The Liberian Institute of Certified Public Accountants (LICPA) is the successor of the Institute of Certified Public Accountants, Liberia (ICPAL) which was established by an act of the National Legislature in 1933 and is the promoter and regulator of the accountancy profession in Liberia. According to section 7 of the LICPA Act 2010, LICPA aims to:

- i) set, monitor and enforce accounting, auditing, other assurance, education, ethics and other professional standards of general and specific application in Liberia;
- ii) license qualified individuals and firms to engage in public accounting in Liberia; and
- iii) supervise the conduct of all persons, firms and individuals, who engage in public accountancy in Liberia.⁷⁶

Only registered members of the Institute are authorized to conduct audit engagements according to section 24 §1 of the LICPA Act 2010.

The LICPA is a member of the International Federation of Accountants (IFAC), the Pan African Federation of Accountants (PAFA) and the Association of Accountancy Bodies in West Africa (ABWA). It issued in 2019 the professional code of conduct and guide for members that is extensively inspired from the guidelines of the International Federation of Accountants (IFAC) and the Nigerian Institute of Charter Accountants.

The Liberia Association Law 1976 does not provide for the conditions under which the companies' accounts shall be audited nor for the presentation of audited annual financial statements to shareholders or authorities.

4.13.2. Audit of Government Agencies and State-Owned Enterprise

The General Auditing Commission (GAC) is an independent commission created by the 1986 Liberian Constitution. It conducts the audit of all Government Ministries and Agencies as well as State owned Enterprises and private entities in which the GoL has share holdings and reports to the National Legislature.

The GAC has a large audit scope. Section 53.1 of the Executive Law defined the audit mandate of the GAC, dividing the mandate into two distinct categories, as reflected below:

⁷⁶ <https://licpa.org.lr/index.php/about-us/objectives/>

- Government agencies: every ministry, bureau, board, commission, institution, authority, organization, enterprise, officer, employee, or other instrumentality of the Government including commonwealths, cities and townships, local authorities, and political units of the Republic; and
- Government organizations: every enterprise, authority, monopoly, factory, or other industrial or commercial facility, corporation, utility, company, lending or financial institution, or other instrumentality which is wholly or partly owned by the Government.

The estimated number of institutions and programs in the mandate is 85 government departments, ministries, agencies, and public corporations. Additionally, the mandate also requires the GAC to audit local governments, other municipalities, embassies, and diplomatic missions.⁷⁷

The GAC is habilitated to conduct the following missions:

- (i) Financial statements audit: determining whether an entity's financial information is presented in accordance with an applicable financial reporting and regulatory framework.
- (ii) Compliance audit: builds on the definition of public sector audits with a specific focus on assessing compliance with criteria derived from authorities.
- (iii) Performance audit: an independent assessment of a program, function, operation or the management systems and procedures of a governmental entity to assess whether the entity is achieving economy, efficiency and effectiveness in the employment of available resources and that value of money is being achieved.
- (iv) IT audit: aims to ensure that the IT resources allow organizational goals to be achieved effectively and use resources efficiently.
- (v) Special audit: comprises the audits that are performed under International Standards of Supreme Audit Institutions (ISSAI) such as forensic audits, agreed upon procedures and environmental audits.
- (vi) Project audit: a systematic and often iterative activity of auditing and verifying a project for consistency and relevance to the basic parameters (quality, performance, cost-effectiveness) that are preset at the very beginning of the project.⁷⁸

Financial statements audit is conducted in accordance with the International Standards of Supreme Audit Institutions (ISSAIs). Those standards and the applicable guidelines require that the Auditor General complies with the ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement.⁷⁹

⁷⁷ [Audit Mandate - General Auditing Commission \(gac.gov.lr\)](https://gac.gov.lr)

⁷⁸ [Audit Services Department - General Auditing Commission \(gac.gov.lr\)](https://gac.gov.lr)

⁷⁹ <https://gac.gov.lr/wp-content/uploads/2023/08/A.G-Report-on-Consolidated-Funds-Account-Financial-Statements-Audit-FY-2022.pdf>

4.14. Production and exports data in the extractive sector

4.14.1. Minerals' production and export data

Production

The table below details the production volume and value for 2023 according to data received from the MME:

TABLE 69: PRODUCTION DATA IN 2023 ACCORDING TO MME

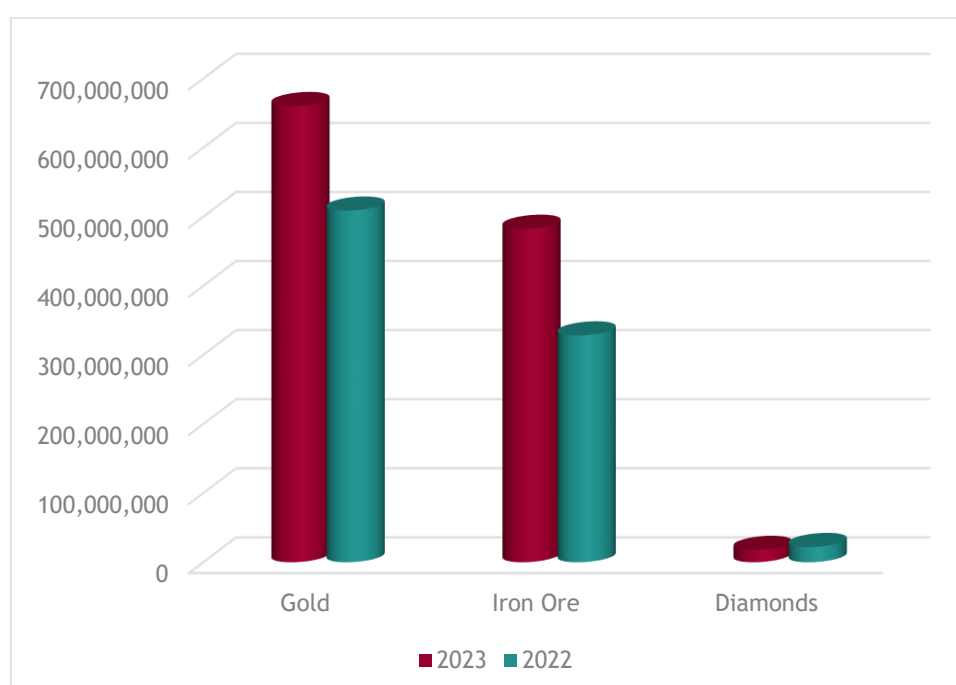
Commodity	Unit	2023		2022		Variance	
		Volume	Value (US\$)	Volume	Value (US\$)	Volume	Value
Gold	Kg	12,379	660,344,177	9,927	508,982,500	25%	30%
Iron Ore	DMT	4,002,474	482,698,381	4,634,543	328,311,026	(14%)	47%
Diamonds	Carat	56,838	17,910,115	55,111	22,070,067	3%	(19%)

Source: MME

The production volumes of Gold noted a considerable increase of 25% compared to 2022, which is due to the continuous increase of monthly production of “BEA MOUNTAIN MINING CORP” with a minimum of 917 kg/month compared to a maximum of 925/kg. The company’s gold production for the month of July 2023 noted a peak of 1,271 kg.

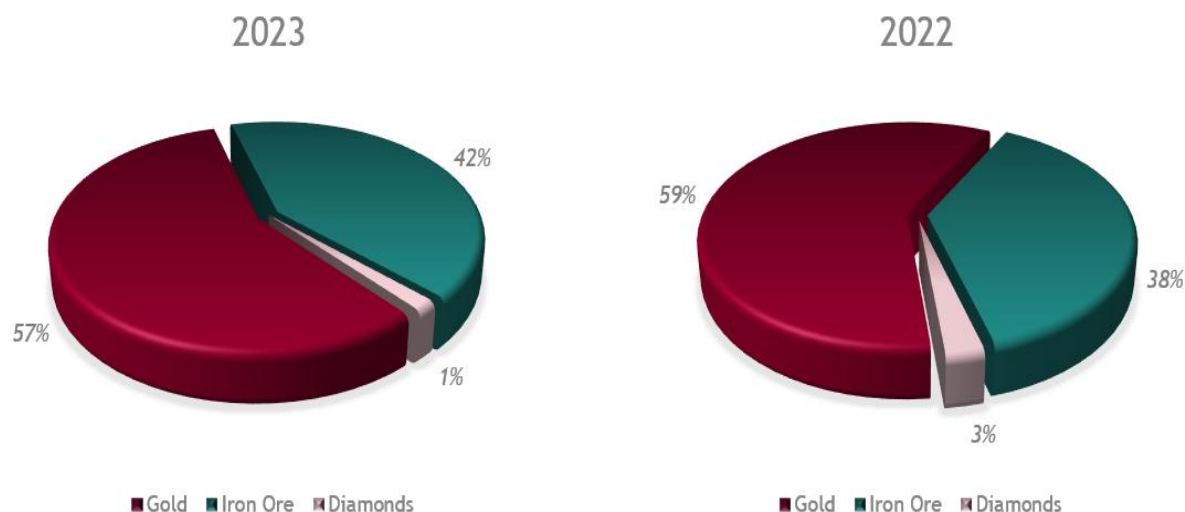
In contrast, production of iron ore continued its decreasing trend, going from 471 KWMT in January 2023 to 70 KWMT in December 2023 according to the monthly production data provided by “ARCELOR MITTAL LIBERIA LTD”.

FIGURE 28: PRODUCTION VALUES IN 2022 AND 2023



As presented in the pie chart below, gold remains the main produced commodity with 57% (a decrease of 2% compared to 2022), followed by Iron ore that represents 42% of production value (38% in 2022), then diamonds with 2%.

FIGURE 29: PRODUCTION MIX BETWEEN 2022 AND 2023



Exports

The MME data shows that the production of 2023 was fully exported for a total amount of US\$ 1.16 bn. No additional quantities coming from previous periods were exported during 2023.

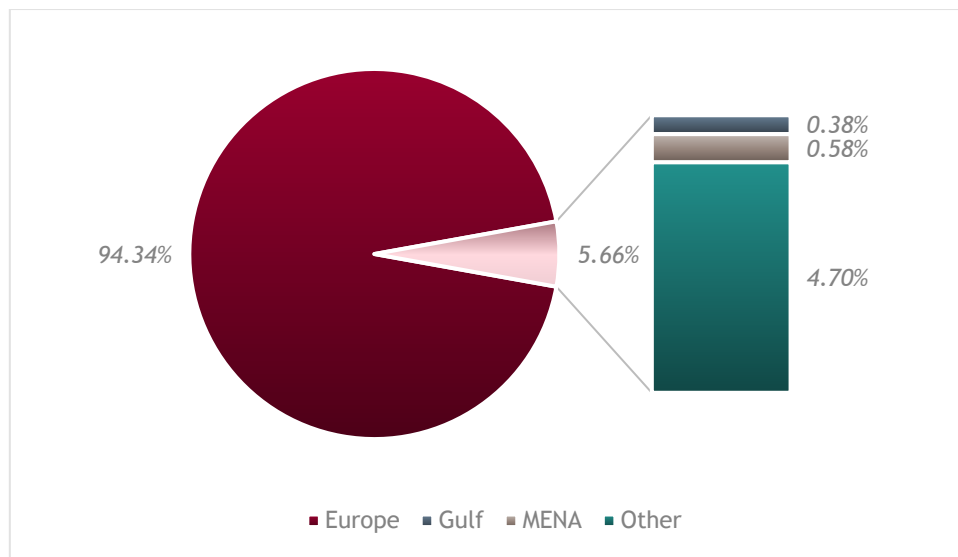
The exports by destination for the FY 2023 are summarized in the table below:

TABLE 70: MINING EXPORTS BY DESTINATION

Region	Value (US\$)	as a %
Gold	660,344,177	56.88%
Europe	655,883,420	56.50%
Gulf	4,460,757	0.38%
Iron Ore	482,698,381	41.58%
Europe	432,839,809	37.28%
Other	49,858,573	4.29%
Diamond	17,910,115	1.54%
Europe	6,574,894	0.57%
MENA	6,679,225	0.58%
Other	4,655,995	0.40%
Total	1,160,952,673	100.00%

Source: MME

FIGURE 30: MINING EXPORTS BY DESTINATION REGION



According to the data obtained from the Central Bank of Liberia (CBL), the mining sector generated US\$ 1.55 bn in the two calendar years 2021 and 2022 as presented in the table below:

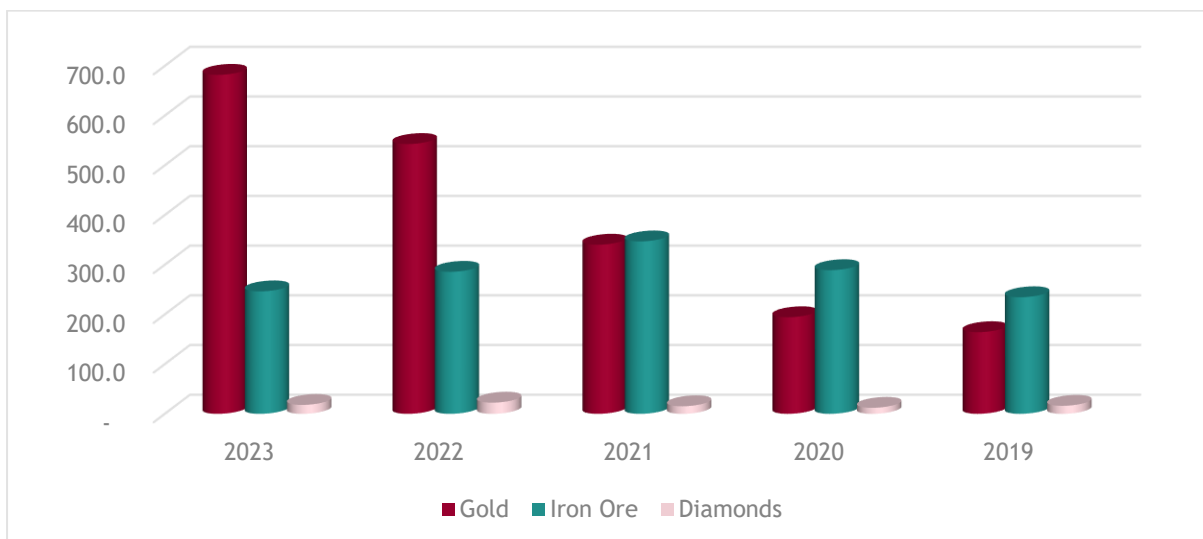
TABLE 71: EXPORTS VALUE BY COMMODITY BETWEEN 2021 AND 2022 (IN MILLION US\$)

Commodity	2023	2022	2021	2020	2019	Proportion
Gold	682.1	542.9	340.3	194.4	164.3	72%
Iron Ore	246.4	285.7	346.9	289.0	234.6	26%
Diamonds	17.9	22.5	15.2	12.1	16.1	2%
Total	946.4	851.2	702.3	495.5	415.0	100%

Source: Central Bank of Liberia

As shown in the figure above, gold represents 72% of all mining exports in 2023, up from just 40% in 2019. The main reason for this increase is the rise of gold price in the international market as well as the increase in volumes produced and exported compared to prior years.

FIGURE 31: MINING EXPORTS EVOLUTION BETWEEN 2019 AND 2023



The table below shows the mining sector exports by company for the reporting period:

TABLE 72: MINING EXPORTS BY COMPANY

Company	Commodity	Unit	2023			2022		
			Volume	Value (US\$ Million)	Market portion	Volume	Value (US\$ Million)	Market portion
Bea Mountain Mining Corp	Gold	Kg	12,146	653.60	56.30%	8,524	450.10	52.38%
Arcelor Mittal	Iron Ore	DMT	3,589,053	432.84	37.28%	4,634,543	328.31	38.20%
Western cluster	Iron Ore	DMT	413,421	49.86	4.29%	-	-	0.00%
MNG Gold	Gold	Kg	-	-	0.00%	1,401	56.53	6.58%
ASM	Gold	Kg	232	6.75	0.58%	82	2.36	0.27%
ASM	Diamond	Carat	56,838	17.91	1.54%	55,111	22.07	2.57%
Total				1,160.95	100.00%		859.36	100.00%

Source: Ministry of Mines and Energy

Bea Mountain Mining Corporation and Arcelor Mittal collectively contributed to more than 93% of the country's mining exports, compared to 91% in 2022.

Artisanal and small-scale mining data

According to the data collected from the MME, the gold and diamonds quantities produced by the ASM sector were fully exported. The table below presents the quantities produced and exported :

TABLE 73: ASM PRODUCTION AND EXPORTS DATA

Commodity	Unit	2023			2022			Variance	
		Volume	Value (US\$)	Part of national production	Volume	Value (US\$)	Part of national production	Volume	Value (US\$)
Gold	Kg	232	6,746,259	1.88%	82	2,355,447	0.83%	184.79%	186.41%
Diamonds	Carat	56,838	17,910,115	100.00%	55,111	22,070,067	100.00%	3.13%	(18.85%)
Total		24,656,374			24,425,514			0.95%	

Source: MME

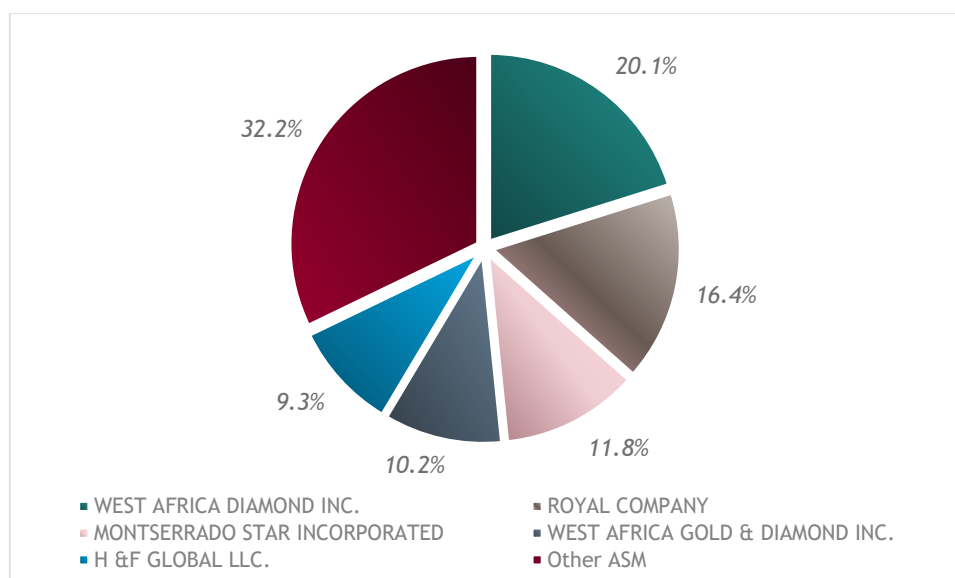
The rise in gold quantities compared to 2022 is explained by the increase in the number of class B and C mining licenses awarded during 2023 upon issuance of 254 new gold licenses. This led to an increase of the ASM part of the gold's national production by 1% compared to 2022, while the total quantity of diamonds produced and exported come from the ASM sector.

The top 5 producers and exporters procured 67.8% of the total ASM production and exports quantities as presented in the table below:

TABLE 74: TOP 5 PRODUCERS AND EXPORTERS IN THE ASM SECTOR

ASM	Commodity	Value (US\$)	%	Cumulative %
WEST AFRICA DIAMOND INC.	DIAMOND	4,967,425	20.1%	20.1%
ROYAL COMPANY	DIAMOND	4,047,621	16.4%	36.6%
MONTSERRADO STAR INCORPORATED	DIAMOND	2,914,586	11.8%	48.4%
WEST AFRICA GOLD & DIAMOND INC.	DIAMOND	2,511,927	10.2%	58.6%
H & F GLOBAL LLC.	GOLD	2,285,502	9.3%	67.8%
Other ASM		7,929,313	32.2%	100.0%
Total		24,656,374	100.00%	

FIGURE 32: TOP 5 EXPORTERS & PRODUCERS IN THE ASM SECTOR

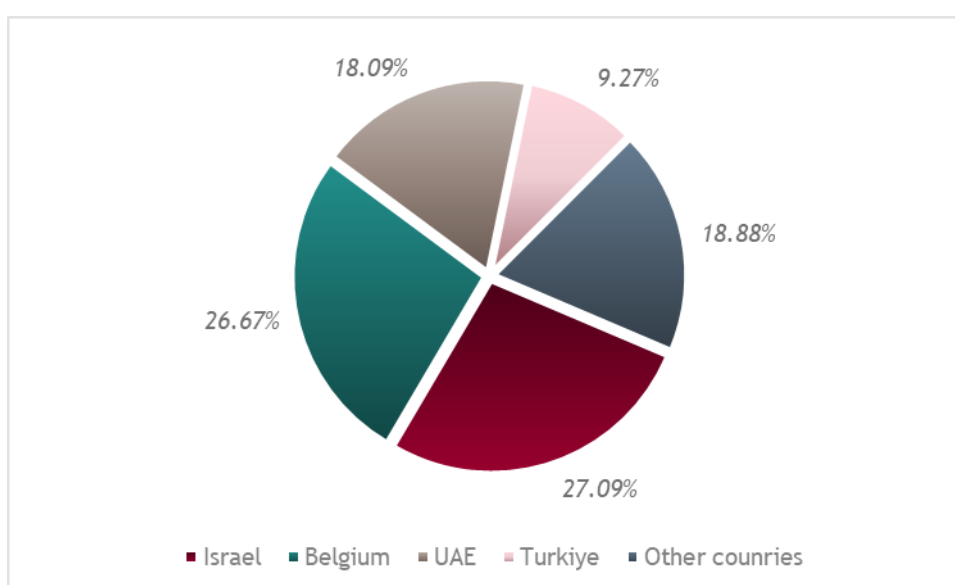


The main countries that attract Liberian ASM production are presented below :

TABLE 75: ASM EXPORTS BY DESTINATION

Country	Commodity	Value	Part as a %
Israel	Diamonds	6,679,225	27.09%
Belgium	Diamonds	6,574,894	26.67%
UAE	Gold	4,460,757	18.09%
Türkiye	Gold	2,285,502	9.27%
Other countries	Gold & Diamonds	4,655,995	18.88%
Total		24,656,374	100.00%

FIGURE 33: ASM EXPORTS BY DESTINATION



It is worth noting that The MME confirmed there has not been any comprehensive study conducted by the Ministry of Mines and Energy to ascertain the actual economic contribution of artisanal and small-scale mining (ASM) to Liberia's overall economy.

4.14.2. Oil and Gas' production and export data

As there are no active oil and gas companies during 2023 according to the NOCAL and LPRA, therefore there is no production or export data to be reported for the period.

4.14.3. Forestry production and export data

Production

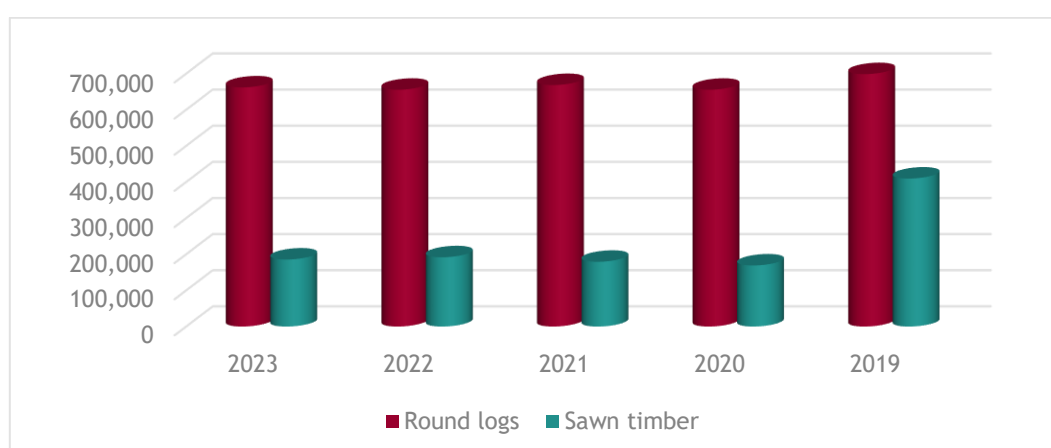
According to data published in the Central Bank of Liberia's annual report for 2023, the forestry sector's production for the last five years is detailed as follows:

TABLE 76: FORESTRY SECTOR PRODUCTION DATA

Commodity	Unit	2023	2022	2021	2020	2019
Round logs	M3	661,958	655,404	668,512	655,404	698,657
Sawn timber	Pc	185,517	191,790	179,243	169,097	409,655

Source: CBL Annual reports 2023 and 2021

FIGURE 34: FORESTRY SECTOR PRODUCTION BETWEEN 2019-2023



As presented above, the quantities produced of round logs and sawn timber did not see notable variations compared to 2022.

The data provided by the FDA show the following production volumes by company:

TABLE 77: PRODUCTION DATA BY COMPANY

Company name	MDA/ Concession / License	Units	Volume (m ³)
Euro Liberia Logging Company	FMC	190	1,955
Iroko Timber & Logging Corporation	CFMA	180	1,241
Kisvan Timber Corporation	CFMA	42	194
Total		412	3,391

Source: FDA

Exports

According to data provided by the Forestry Development Authority, forestry companies exported 98,426 m³ of round logs, generating US\$ 4.3 million in 2023, compared to 159,473 m³ for US\$ 3.6 million in 2022 as presented in the table below:

TABLE 78: FORESTRY SECTOR EXPORTS

	2023	2022	Variance
Volume	98,426	159,473	(38.28%)
Value (US\$)	4,323,123	3,681,749	17.42%

Source: FDA

The decrease in logs quantities exported is due to the closing of several companies in 2023 such as Indo African Plantations Liberia and Coveiyalah Investment Enterprises Inc., which resulted in a drop of quantities exported by more than 38%. On the other hand, the increase of log prices in the international market helped cover the shortage of supply, since Liberian logs were exported for an average per m³ unit price of US\$ 43.92 compared to US\$ 23.09 in 2022, an increase of more than 90%.

The table below presents the logs exports by company:

TABLE 79: ROUND LOGS EXPORTS BY COMPANY & DESTINATION

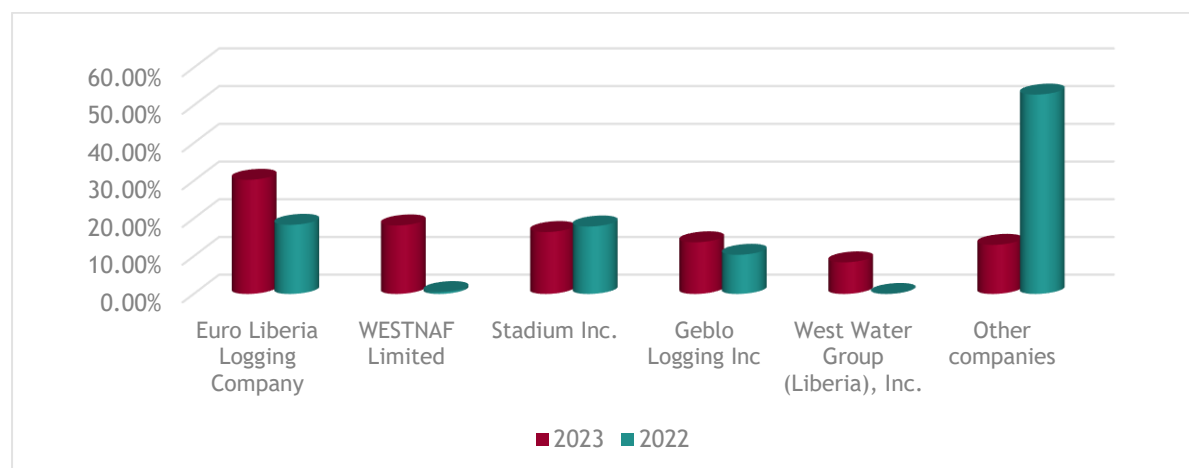
Company	2023			2022		
	Volume (m ³)	Value (US\$)	Portion	Volume (m ³)	Value (US\$)	Portion
Euro Liberia Logging Company	39,679	1,308,897	30.3%	27,675	675,092	18.3%
WESTNAF Limited	753	785,785	18.2%	1,662	18,626	0.5%
Stadium Inc.	16,609	710,048	16.4%	31,042	658,782	17.9%
Geblo Logging Inc	17,277	592,632	13.7%	15,975	382,400	10.4%
West Water Group (Liberia), Inc.	10,001	362,622	8.4%	-	-	0.0%
Kisvan Timber Corporation	4,065	195,465	4.5%	7,377	158,746	4.3%
Horizon Logging Limited	2,450	102,613	2.4%	13,250	297,581	8.1%
Mandra Forestry Liberia Ltd	2,545	87,593	2.0%	11,076	270,507	7.3%
WAFDI	1,952	67,531	1.6%	4,400	99,010	2.7%
Masayaha Logging	1,331	50,792	1.2%	3,771	90,245	2.5%
L&S Resources Inc	1,453	42,000	1.0%	2,246	52,839	1.4%
Keshav Global Industries Ltd	312	17,145	0.4%	-	-	0.0%
Indo African Plantations Liberia Inc	-	-	0.0%	16,077	386,190	10.5%
Coveiyalah Investment Enterprises	-	-	0.0%	15,977	381,237	10.4%
Akewa Groups of Companies	-	-	0.0%	5,723	136,991	3.7%
Alpha Logging and Wood Processing	-	-	0.0%	3,150	72,072	2.0%
Dadekoloi Liberia Limited	-	-	0.0%	73	1,431	0.0%
Total	98,426	4,323,123	100.0%	159,473	3,681,749	100.0%

Source: Forestry Development Authority (FDA)

In 2023, the top five exporting companies contributed 87% to log exports, up from 67% in 2022. New entrants like WESTNAF Limited ranked second with 18.2%, and West Water Group (Liberia) Inc., a newly licensed company, ranked third with 16.4%. These companies replaced Indo African Plantations Liberia and Coveiyalah Investment Enterprises, which lost their 21% market share from 2022.

Euro Liberia Logging Company remains the major exporter with almost 40K m³ of round logs exported, representing 30.3% of Liberia's round logs exports with an increase of 12% in its market share.

FIGURE 35: TOP 5 LOG EXPORTERS IN 2023



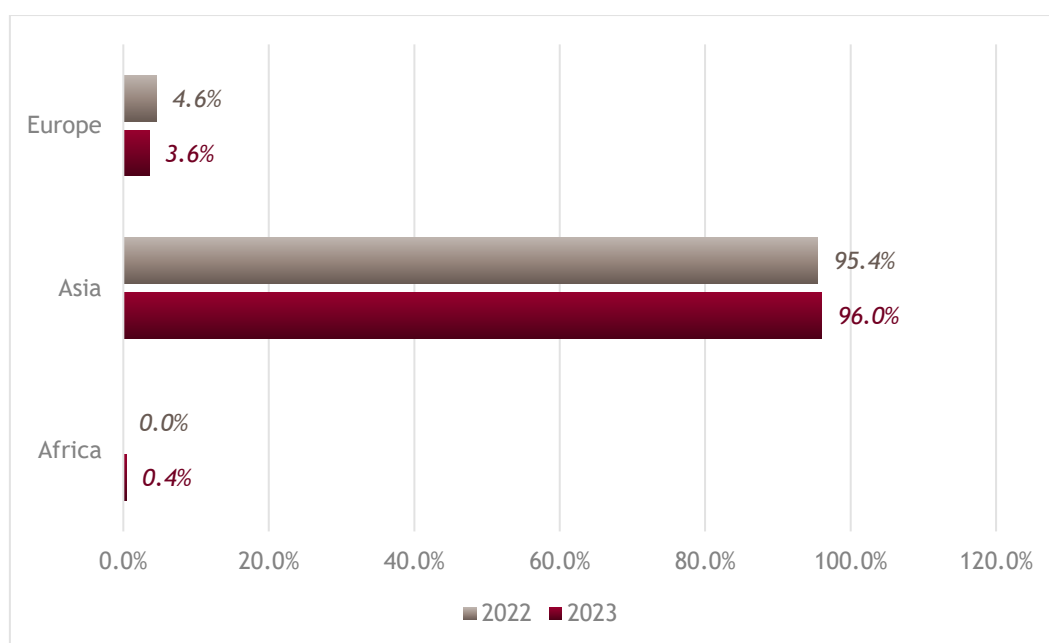
The table below presents the destination of Liberian log exports:

TABLE 80: EXPORTS OF ROUND LOGS BY COUNTRY

Destination	2023		2022	
	Volume (m ³)	Value (US\$)	Volume (m ³)	Value (US\$)
China	45,856	1,735,675	23,952	507,400
Bangladesh	44,933	1,467,428	98,507	2,333,027
India	1,349	802,333	5,037	89,110
Singapore	2,852	109,356	4,558	100,997
Italy	1,108	102,273	113	3,018
France	614	51,275	5,514	141,098
United Arab Emirates	912	23,601	63	1,531
Morocco	429	15,726	-	-
Korea Republic	189	5,460	-	-
Vietnam	76	3,771	20,327	472,788
Tunisia	45	3,495	-	-
Turkey	62	2,730	491	9,309
Germany	-	-	760	18,538
Portugal	-	-	152	4,933
Total	98,426	4,323,123	159,473	3,681,749

Source: Forestry Development Authority (FDA)

FIGURE 36: EXPORTS BY DESTINATION



As set above, most of the Liberian log is exported to Asian countries. China, Bangladesh and India are the main destinations with 93% of exports.

4.14.4. Agriculture production and export data

Production

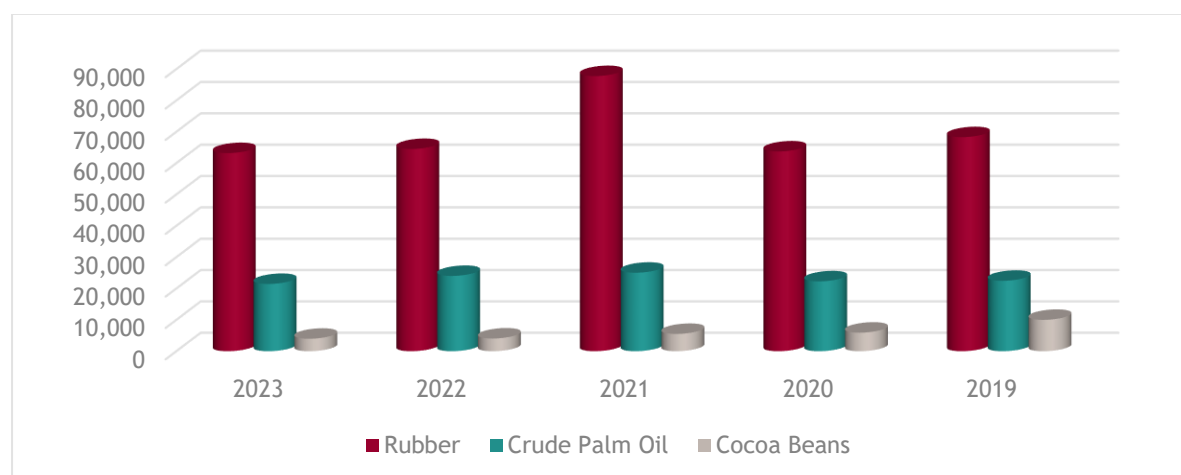
The table below presents the agriculture sector production between 2019 and 2023 according to CBL annual reports:

TABLE 81: AGRICULTURE SECTOR PRODUCTION BETWEEN 2019-2023

Commodity	Unit	2023	2022	2021	2020	2019
Rubber	MT	63,211	64,516	87,777	63,734	68,285
Crude Palm Oil	MT	21,461	24,019	25,041	22,286	22,465
Cocoa Beans	MT	3,973	4,046	5,511	5,916	9,997

Source: Central Bank of Liberia annual reports

FIGURE 37: AGRICULTURE SECTOR PRODUCTION BETWEEN 2019-2023



The decrease in produced volumes between 2022 and 2023 is due to the low harvest by small farmers, as well as replanting in many farms.

The MoA did not provide our report with the production data. Accordingly, we relied on the data provided by in-scope companies detailed in the table below:

TABLE 82: AGRICULTURE PRODUCTION BY COMPANY

Company	Commodity	Unit	2023	2022	Variance
Firestone Liberia	Rubber	Lbs	99,615,565	104,379,533	(4.56%)
Cavalla Rubber Corporation	Rubber	MT	4,177	8,878	(52.96%)
Cavalla Rubber Corporation	Palm	MT	6,586	4,300	53.16%
Golden Veroleum Liberia	Crude Palm Oil	MT	65,863	-	100.00%
Golden Veroleum Liberia	Palm Kernel	MT	7,508	-	100.00%
Liberian Agricultural company	Rubber	MT	27,694	26,517	4.44%
Libinc Oil Palm	Crude Palm Oil	MT	19,408	20,756	(6.49%)
Libinc Oil Palm	Kernel Palm	MT	3,927	4,081	(3.75%)
Libinc Oil Palm	Kernel Palm Oil	MT	1,625	1,647	(1.35%)
Libinc Oil Palm	Palm Kernel Cake	MT	2,711	2,282	18.80%
Maryland Oil Palm Plantation	Palm FFB	MT	36,125	-	100.00%
Maryland Oil Palm Plantation	Crude Palm Oil	MT	-	7,353	(100.00%)
Maryland Oil Palm Plantation	Kernel Palm	MT	-	973	(100.00%)

Source: in-scope extractive companies. The Ministry of Agriculture (MoA) did not provide the exports data related to these agricultural companies.

As presented above, there is a slight decrease in volumes of agricultural crops produced in 2023 compared to 2022, particularly for rubber.

Exports

The table below presents the agriculture sector's exports value between 2021 and 2023:

TABLE 83: AGRICULTURE SECTOR EXPORTS BETWEEN 2021-2023

In US\$ million

Commodity	2023	2022	2021
Rubber	107.8	101.1	110.0
Crude Palm Oil	24.1	31.6	32.5
Cocoa Beans	4.0	3.6	5.9
Total	135.9	136.3	148.4

Source: [CBL annual report 2023](#)

As presented above, rubber exports noted a slight increase of nearly 7% - despite declining production volumes - due to the rise of rubber prices in the international market. In contrast, crude palm oil exports noted a 24% decrease in value that is due to the sharp drop in the global price by 30.5% between 2022 and 2023⁸⁰.

⁸⁰ <https://www.cbl.org.lr/sites/default/files/documents/2023ANNUALREPORT.pdf>

According to the in-scope extractive companies, exports totaled US\$ 188 million as shown in the table below:

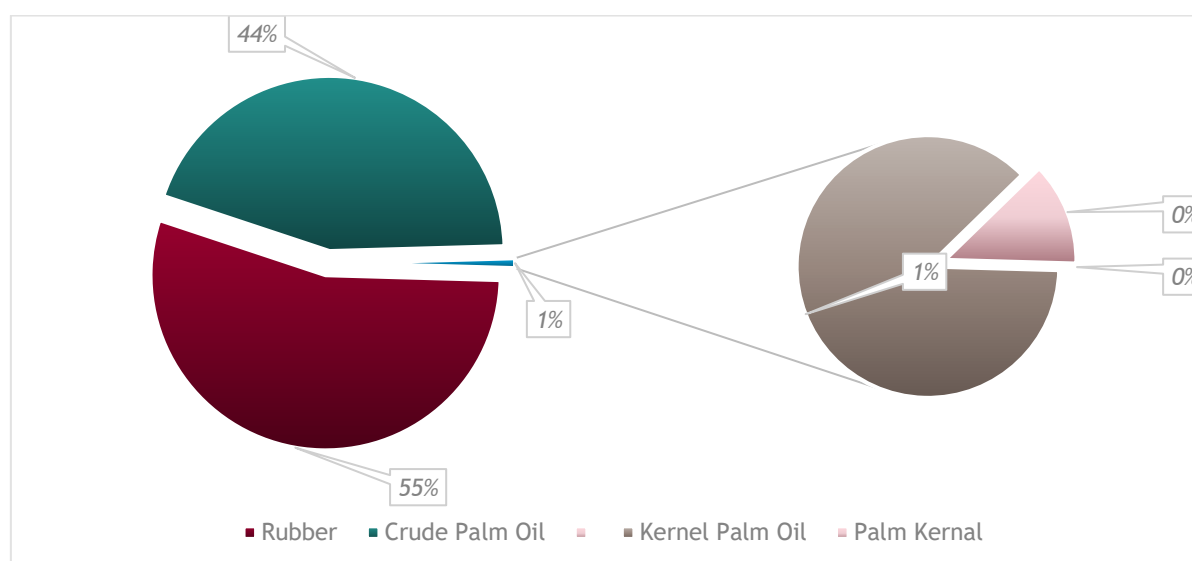
TABLE 84: AGRICULTURE SECTOR EXPORTS BY COMPANY & COMMODITY

Company	Commodity	Unit	Volume	Value (US\$)
Cavalla Rubber Corporation	Rubber	MT	4,425	5,381,740
Firestone Liberia	Rubber	Lb	96,312,731	59,761,561
Golden Veroleum Liberia	Crude Palm Oil	MT	63,226	53,598,654
Golden Veroleum Liberia	Palm Kernel	MT	1,416	213,714
Liberian Agricultural Company	Rubber	MT	28,670	37,852,630
Libinc Oil Plam Plantation	Crude Palm Oil	MT	22,390	20,278,619
Libinc Oil Plam Plantation	Palm Kernel	MT	1,544	1,465,319
Maryland Oil Palm Plantation	Crude Palm Oil	MT	9,063,960	9,910,954
Total				188,463,190

Source: in-scope extractive companies. The Ministry of Agriculture (MoA) did not provide the exports data related to these agricultural companies.

The pie chart below presents the agriculture sector's exports by commodity:

FIGURE 38: AGRICULTURE SECTOR EXPORTS BY COMMODITY



As presented in the pie chart above, rubber is the main cash provider in the agriculture sector with total exports of US\$ 103 million (55%), followed by crude palm oil (44%).

Below are the exports by commodity and by destination according to the available data provided by the in-scope extractive companies:

TABLE 85: AGRICULTURE SECTOR EXPORTS BY DESTINATION

Company	Commodity	Unit	Volume	Value (US\$)	Portion
Cavalla Rubber Corporation			4,425	5,381,740	2.86%
Germany	Rubber	MT	1,210	1,476,454	0.78%
India	Rubber	MT	766	944,531	0.50%
Netherlands	Rubber	MT	1,169	1,367,804	0.73%
Spain	Rubber	MT	1,280	1,592,951	0.85%
Firestone Liberia			96,312,731	59,761,561	31.71%
Cote d'Ivoire	Rubber	Lbs	44,445	33,645	0.02%
Mexico	Rubber	Lbs	1,600,027	1,024,746	0.54%
Spain	Rubber	Lbs	5,600,094	3,439,845	1.83%
USA	Rubber	Lbs	89,068,165	55,263,325	29.32%
Golden Veroleum Liberia			64,642	53,812,368	28.55%
Spain	Crude Palm Oil	MT	17,618	13,327,835	7.07%
West Africa	Crude Palm Oil	MT	45,608	40,270,819	21.37%
Cote d'Ivoire	Palm Kernal	MT	1,416	213,714	0.11%
Liberian Agricultural Company			28,670	37,852,630	20.08%
Not provided	Rubber	MT	28,670	37,852,630	20.08%
Libinc Oil Plam Plantation			23,935	21,743,937	11.54%
Cameroun	Crude Palm Oil	MT	6,727	6,039,745	3.20%
Ghana	Crude Palm Oil	MT	10,006	9,853,751	5.23%
Morocco	Crude Palm Oil	MT	2,834	2,238,465	1.19%
Netherlands	Crude Palm Oil	MT	2,823	2,146,657	1.14%
India	Kernel Palm Oil	MT	852	789,853	0.42%
Morocco	Kernel Palm Oil	MT	692	675,466	0.36%
Maryland Oil Palm Plantation			9,063,960	9,910,954	5.26%
Cote d'Ivoire	Crude Palm Oil	MT	9,063,960	9,910,954	5.26%
Total				188,463,190	100.00%

Source: In-scope extractive companies. The MoA did not provide us with exports data in the agriculture sector.

The figures below present the exports value by country and continent:

FIGURE 39: AGRICULTURE SECTOR EXPORTS BY DESTINATION

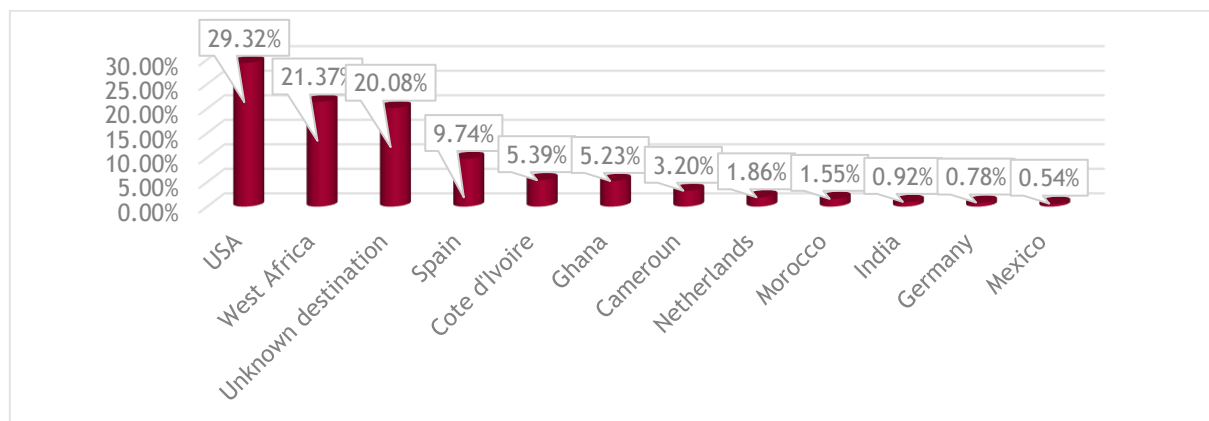
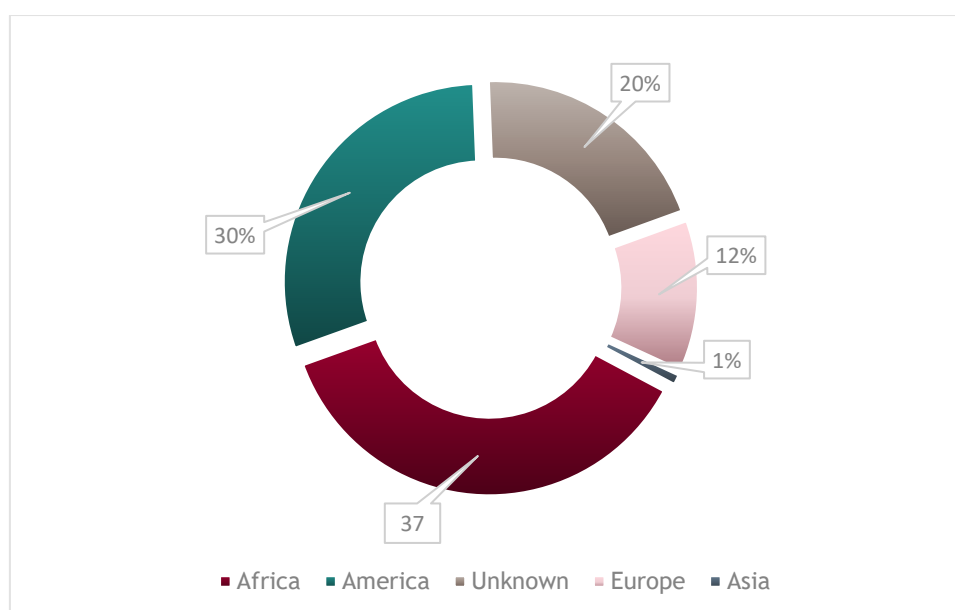


FIGURE 40: AGRICULTURE SECTOR EXPORTS BY CONTINENT



As presented above, 37% of the Liberian exports remain within the African continent, consisting mainly of palm oil, followed by America (30%) which is the traditional market of Liberia's rubber production.

4.15. The contribution of the extractive sector to the economy

4.15.1. Extractive sector contribution to GDP

As presented in the table below, the extractive sector contribution presents 56% of Liberia's real GDP for FY 2023, without noting significant changes in the contribution by sector between 2021 and 2023:

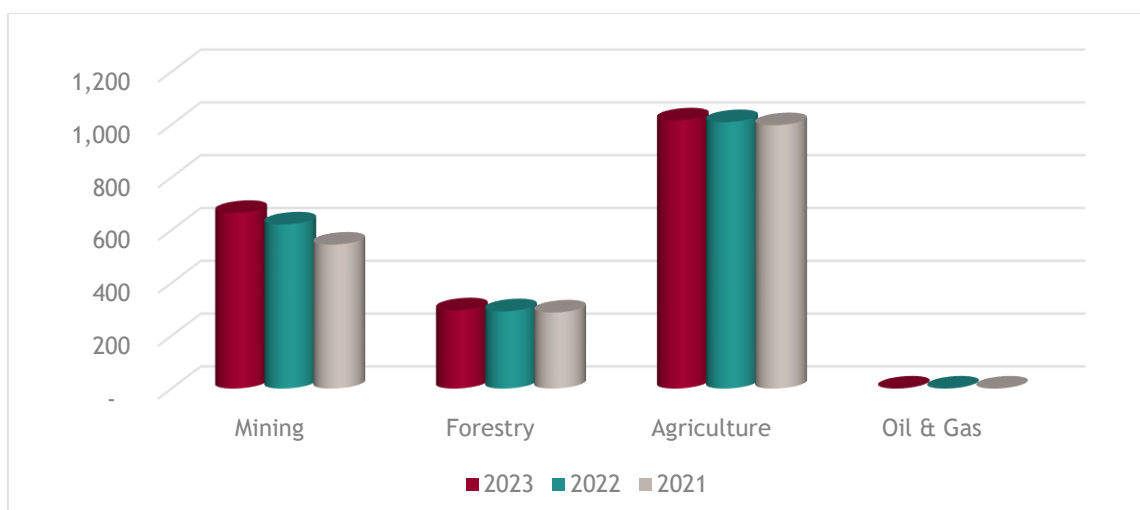
TABLE 86: EXTRACTIVE SECTOR CONTRIBUTION TO GDP BETWEEN 2021-2023

(in million US\$)

Sector	2023		2022		2021	
Real GDP	3,553.20		3,398.40		3,242.40	
Mining & Panning	665.4	19%	621.8	18%	545.3	17%
Forestry	296.5	8%	292.9	9%	288.2	9%
Agriculture & Fisheries	1,015.90	29%	1,009.30	30%	997.7	31%
Oil & Gas	-	0%	-	0%	-	0%
Total	1,977.80	56%	1,924.00	57%	1,831.20	56%

Source: [Central Bank of Liberia](#)

FIGURE 41: EXTRACTIVE SECTOR CONTRIBUTION TO GDP BETWEEN 2021-2023



4.15.2. Extractive sector contribution to the State revenue

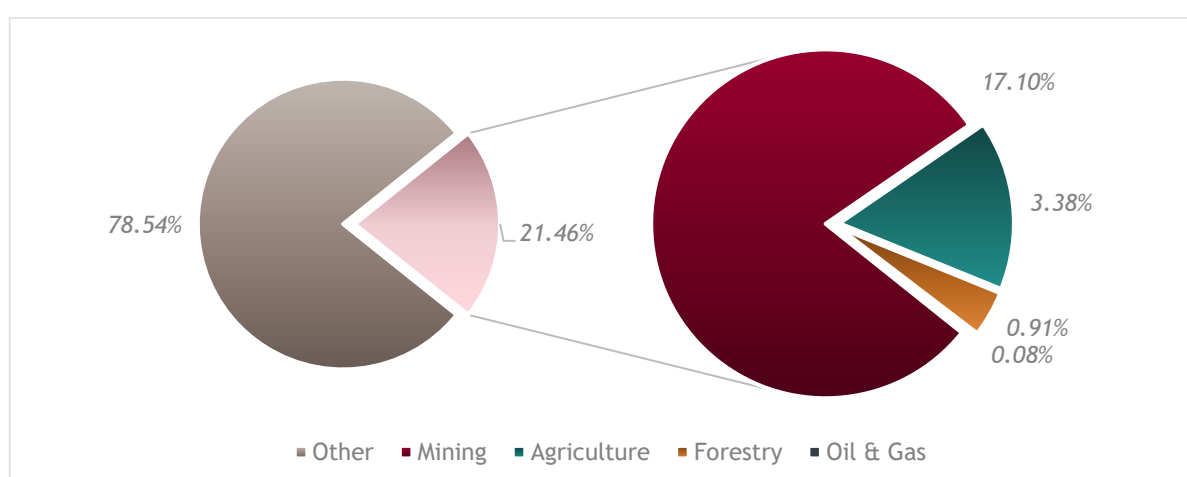
The extractive sector contribution to the State revenue is presented in the table below:

TABLE 87: EXTRACTIVE INDUSTRIES SHARE OF GOVERNMENT REVENUES

Description	Amount in million US\$	Contribution in %
Mining sector	121.49	17.10%
Agriculture sector	23.97	3.38%
Forestry sector	6.44	0.91%
Oil & Gas	0.55	0.08%
Extractive sector revenues ⁸¹	152.46	21.46%
Total Government Revenues (*)	710.29	100%

(*) Source: [Central Bank of Liberia](#)

FIGURE 42: EXTRACTIVE SECTOR CONTRIBUTION TO STATE REVENUE



⁸¹ Source: Total receipts for the period from 1 January to 31 December 2023, collected from different reporting entities during the reconciliation phase.

4.15.3. Extractive sector contribution to the State exports

The extractive sector contributed to **98%** of the Liberian exports 2023 according to the data provided by the government agencies as presented in the table below:

TABLE 88: EXTRACTIVE SECTOR CONTRIBUTION TO THE STATE EXPORTS

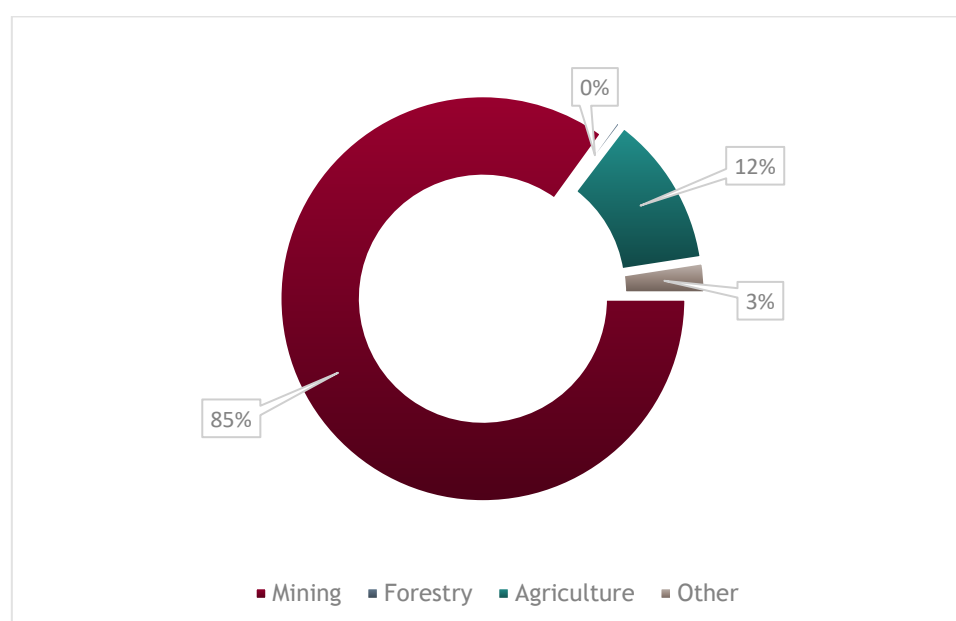
Sector / commodity	Amount (US\$ million)	Contribution In %
Mining sector (*)	946.40	84.96%
Forestry sector (**)	4.32	0.39%
Agriculture sector (*)	135.90	12.20%
Total extractive sector	1,086.62	97.55%
Total exports (*)	1,113.90	100.00%

(*) Source: [Central Bank of Liberia](#)

(**) Source: FDA

The pie chart below presents the contribution of each extractive sector to the State's exports in 2023:

FIGURE 43: EXTRACTIVE SECTOR CONTRIBUTION TO THE STATE'S EXPORTS



The mining sector is alone covering 85% of total exports, mainly Gold that provided 61% of the country's exports, followed by Iron Ore (22%), while diamonds contribution is limited to 2% as the activity is duly ensured by artisanal small-scale miners.

4.15.4. Extractive sector contribution to employment

As presented below, the extractive sector provides livelihoods to 0.49% of the country's labor force, 81% of them are male workers, while only 19% are female according to data provided by the MoL:

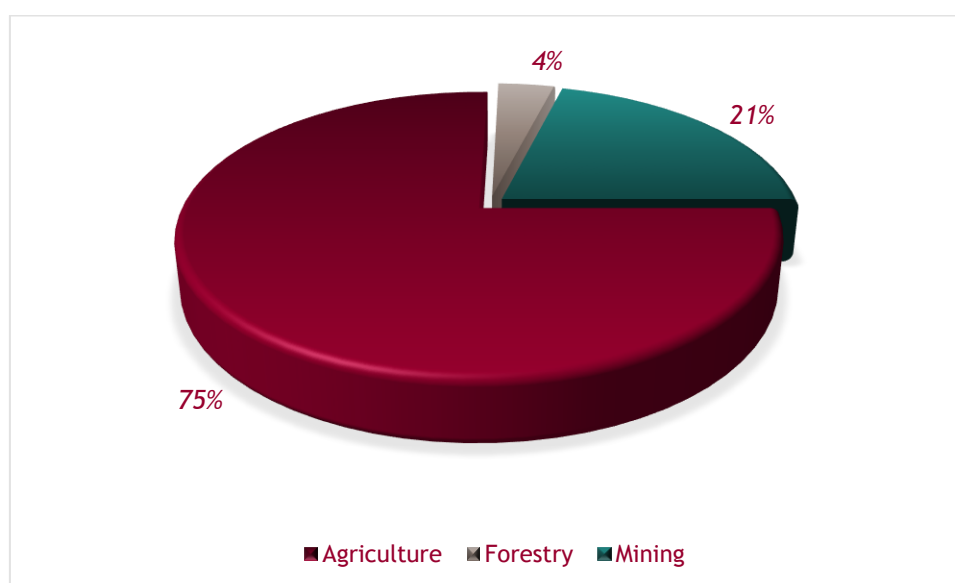
TABLE 89: EXTRACTIVE SECTOR CONTRIBUTION TO EMPLOYMENT

Sector	Male		Female		Total	Extractive sector Contribution (%)	Contribution to the labor force (%)
Agriculture	7,197	58.36%	2,105	17.07%	9,302	75.42%	0.37%
Forestry	416	3.37%	28	0.23%	444	3.60%	0.02%
Mining	2,375	19.26%	212	1.72%	2,587	20.98%	0.10%
Total	9,988	80.99%	2,345	19.01%	12,333	100.00%	0.49%
Liberia 2023 labor force⁸²					2,532,446		100%

Source: Ministry of Labor (MoL)

As presented in the graph below, agriculture remains the extractive sector's largest employer providing livelihoods to 75% of the labor force, followed by the mining sector with 21%:

FIGURE 44: CONTRIBUTION TO EMPLOYMENT BY EXTRACTIVE SECTOR



The nationality of extractive sectors workers in Liberia is presented in the table below:

TABLE 90: EXTRACTIVE SECTORS EMPLOYMENT BY NATIONALITY

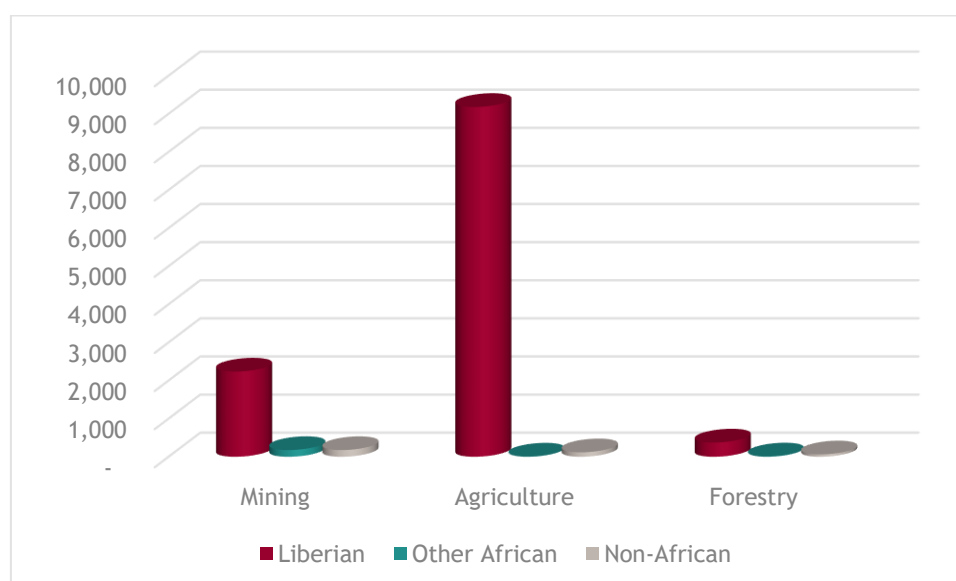
Nationality	Mining	Agriculture	Forestry	Total	%
Liberian	2,236	9,181	374	11,791	95.61%
Other African	176	5	8	189	1.53%
Non-African	175	116	62	353	2.86%
Total	2,587	9,302	444	12,333	100.00%

Source: Ministry of Labor (MoL)

⁸² <https://data.worldbank.org/indicator/SL.TLF.TOTL.IN?locations=LR>

Liberians represent 96% of the extractive sector's labor force, while neighbouring African countries contribute with 189 employees representing 1.53% of the extractive sector's labor force.

FIGURE 45: EXTRACTIVE SECTORS EMPLOYMENT BY NATIONALITY



4.16. Management and monitoring of environment in the extractive sector

4.16.1. Legal framework governing Liberia's environment

The EPA was founded on 26 November 2002 and is mandated to oversee the nation's natural resources and environment. The EPA operates on three (3) basic legal Instruments:

TABLE 91: LEGAL FRAMEWORK FOR THE ENVIRONMENT MANAGEMENT IN LIBERIA⁸³

Legal instrument	Description
The National Environmental Policy (NEP) , (2002)	<p>The NEP ordered the creation of the EPA to ensure sound environmental management and put in place measures to avoid irreparable damage to the country's natural resources. The NEP seeks to harmonize cross cutting functions between and amongst agencies. The NEP seeks to ensure long-term economic prosperity of Liberia through sustainable social and economic development of the generation without endangering the potential of future generation.</p> <p>The objective of the NEP is to improve the physical environment, the quality of life and the improvement of economic and social living conditions of present and future generations of Liberian citizens. It also seeks to ensure reconciliation and coordination between economic development and growth with the sustainable management of natural resources. A National Environmental Policy provides a broad framework for the implementation of national objectives and plans.</p>
The Environmental Protection and	The EPML establishes a legal framework for the sustainable development, management and protection of the environment by the EPA in partnership

⁸³ <https://www.epa.gov.lr/content/brief-history>

Legal instrument	Description
<u>Management Law (EPML), (2003)</u>	<p>with regulatory Ministries and organizations and in a close and responsive relationship with the people of Liberia; and to provide high quality information and advice on the state of the environment and for matters connected therewith. The EMPL have several principles and objectives to include but not limited to the following:</p> <ul style="list-style-type: none"> - The principle of sustainable development; - The precautionary principle; - The polluter - pays principle; - The principle of inter-generational equity; - The principle of public participation; - The principle of international co-operation in the management of environmental resources shared by two or more states; and - Other principles of natural resources and environmental management.
<u>The Act establishing the EPA, (2002)</u>	<p>The Act creating the EPA provides the legal mandates and authority to manage coordinate, monitor and supervise in consultation with relevant line Ministries, Agencies and organization, and other relevant stakeholders for the protection of the environment and sustainable use of natural resources.</p> <p>The act details the functions of the EPA from the Policy Council to environmental inspectors. The Act also clearly explains the entire environmental impact assessment (EIA) process in its totality.</p>

4.16.2. Environmental management

EPA's main roles for environmental management

The EPA is the principal authority in Liberia for the management of the environment and shall co-ordinate, monitor, supervise and consult with relevant stakeholders on all activities in the protection of the environment and sustainable use of natural resources. Its functions mainly include:

TABLE 92: MAIN FUNCTIONS OF THE EPA FOR THE MANAGEMENT OF THE ENVIRONMENT⁸⁴

N° EPA's main functions for environmental management	
1	Co-ordinate, integrate, harmonize and monitor the implementation of environmental policy and decisions of the Policy Council by the Line Ministries; ensure the integration of environmental concerns in overall national planning.
2	Ensure the integration of environmental concerns in overall national planning
3	Collect, analyze and prepare basic scientific data and other information pertaining to pollution, degradation and environmental quality, resource use and other environmental protection and conservation matters and undertake research and prepare and disseminate a biannual report on the state of the environment in Liberia.
4	Build the capacity of line Ministries, authorities and organizations through the exchange of data and information, and to render advice, technical support and training in environment and national resource management so as to enable them to carry out their responsibilities effectively; ensure the preservation and promotion of important historic, cultural and spiritual values of natural resources heritage and, in consultation with indigenous authority, enhance indigenous methods for effective natural resource management.

⁸⁴ <https://epa.gov.lr/about-epa/>

N° EPA's main functions for environmental management

- 5 ensure the preservation and promotion of important historic, cultural and spiritual values of natural resources heritage and, in consultation with indigenous authority, enhance indigenous methods for effective natural resource management

- Promote public awareness through public participation in decision making and formal and informal education about the protection and sustainable management of the environment, and to allow, at minimal or no costs, access on environmental information and records; integrate scientific mechanisms and technical requirements in environmental management in order to develop indicators for environmental changes and progress of environmental sustainability; the use of appropriate environmentally sound technologies and renewable sources of energy and natural resources.

- 7 Establish environmental criteria, guidelines, specifications and standards for production processes and the sustainable use of natural resources for the health and welfare of the present generation, and in order to prevent environmental degradation for the welfare of the future generations.

- 8 Identify projects, activities, policies, and programs for which environmental impact assessment must be conducted.

- 9 Initiate and co-ordinate actions required in a state of environmental emergency or any other situation which may pose serious threat to the environment and public health.

- 10 Monitor and assess projects and activities including activities being carried out by relevant ministries and bodies to ensure that the environment is not degraded by such activities and that environmental management objectives are adhered to and adequate early monitoring on impending environmental emergencies is given.

- 11 Review sectoral environmental laws and regulations and provide recommendations for amendments and to initiate proposals for the enactment of environmental legislation.

- 12 Function as the national clearinghouse for all activities relating to regional and international environment-related conventions, treaties and agreements, and as national liaison with the secretariat for all such regional and international instruments;

- 13 Improve efficiency of financial processes under multilateral agreements by prioritizing and harmonizing host and donor priorities in programs, project preparation and design; advise the State and participate in the process of negotiating, ratifying or acceding to relevant regional and international environmental agreements.

Environmental Impact Assessment (EIA)

The EIA is a systematic process to identify, predict and evaluate the environmental effects of proposed projects, plans or policies. This process is applied prior to major decisions and commitments being made. The EIA process helps to provide stakeholders with information about the likely environmental impacts of projects. In some cases, the outcome of the EIA processes may require a developer to alter or in extreme cases abandon a project. Although the EIA processes may result in delays and added costs, these will be outweighed by the overall benefits that accrue from EIA application.⁸⁵

⁸⁵ <https://www.clientearth.org/media/wazpf1zz/guidelines-2006-environmental-impact-assessment-procedural-guideline-liberia-abstract-ext-en.pdf>

The table below present the list of petroleum, mining, agriculture and forestry projects and activities requiring an Environment Impact Assessment according to the Environmental Protection and Management Law (EPML):

TABLE 93: PROJECTS/ACTIVITIES REQUIRING AN ENVIRONMENTAL IMPACT ASSESSMENT⁸⁶

Sector/Industry	Projects/Activities requiring an Environmental Impact Assessment (EIA)
Extractive Industries	<ul style="list-style-type: none"> - Extraction of petroleum; - Extraction and purification of natural gas; - Other deep drilling - bore-holes and wells; - Mining; - Quarrying; - Coal mining; and - Sand dredging.
Petroleum Industry	<ul style="list-style-type: none"> - Oil and gas exploration and development, including seismic survey; - Construction of offshore and onshore pipelines; - Construction of oil and gas separation, processing, handling and storage facilities; - Construction of oil refineries; - Construction of product depots for the storage of petrol, gas, diesel, tar and other products within commercial, industrial or residential areas; and - Transportation of petroleum products.
Agriculture	<ul style="list-style-type: none"> - Cultivating natural and semi-natural not less than 50 ha; - Water management projects for agriculture (drainage, irrigation); - Large scale monoculture (cash and food crops); - Pest control projects (i.e. tsetse, army worm, locusts, rodents weeds) etc; - Fertilizer and nutrient management; - Agricultural programs necessitating the resettlement of communities; - Introduction of new breeds of crops; and - Arial spraying.
Forestry	<ul style="list-style-type: none"> - Timber logging and processing; - Forest plantation and afforestation and introduction of new species; - Selective removal of single commercial tree species; and - Pest management.

The following is a sequence of major operating stages required in the EIA process⁸⁷:

⁸⁶ Annex 1 of the Environment Protection and Management Law of Liberia (EMPL):

<https://www.epa.gov.lr/sites/default/files/ENVIRONMENTAL%20AND%20MANAGEMENT%20LAW%20III.pdf>

⁸⁷ <https://epa.gov.lr/wp-content/uploads/2025/01/ESIA-2021-REVISED-PROCEDURAL-GUIDELINE-1-1-2.pdf>

TABLE 94: EPA'S EIA PROCESS STAGES⁸⁸

N°	Process stage	Description
1	Applications for EIA permit	Prior to the commencement of works, a proponent whose project /activity falls under the prescribed list of Annex 1 of the Environment Protection and Management Law of Liberia (EMPL) is required to obtain an application for EIA permit/ license.
2	Submission of a Project Brief	The proponent is expected to submit the filled form alongside with a project brief and a specified fee to the EPA. If the EPA considers the project brief to be complete, a copy of the project brief will be transmitted to individual relevant line ministry/agency ten days after its submission, for comments.
3	Screening	<p>The proponent is required to establish environmental impact study in compliance to section 14 of the EMPL.</p> <p>The EPA will evaluate the project brief and transmit a copy with comments to relevant line ministries /agencies.</p> <p>The following determination may be made from the screening process:</p> <ul style="list-style-type: none"> - A certificate of approval may be issued to the applicant where the EPA considers that the project / activity will not have or is unlikely to have a significant environmental impact; or that the project discloses sufficient mitigation measures to ensure the acceptability of the anticipated impacts. - Where further study is necessary to determine the level of EIA required, the applicant will need to prepare an environmental review/ initial environmental examination or evaluation. - The proponent or applicant will be required to prepare and environmental impact study if the project/activity will have or is likely to have a significant impact on the environment.
4	Scoping	<p>If an EIA is required, the proponent will be requested to carry out a public consultation termed scoping. The scoping exercises will identify what possible impacts there may be from the project and from alternatives considered.</p> <p>This process will also lead to the identification of terms of reference for preparation of Environmental Impact Statement of the proposed project. The Terms of Reference must consider issues contained in Annex- B and the results of the consultations.</p> <p>The EPA must approve the TOR prior to commencement of the EIA study. Consultants for EIA must also meet the qualification criteria set by the Agency, and be in its Registry.</p>
5	Preparation and Submission of EIA Report	Where EIA is required, the applicant will prepare an EIA report that includes Environmental Impact Statement (EIS) and Environmental Management Plan (EMP) in line with the Terms of Reference approved by the EPA.
6	Review of the EIA Report	The EPA will study the report to ensure that it is of standard and addresses the scope of work outlined in the terms of reference. If the report is satisfactory in these respects, the Agency will distribute copies of it to the relevant line ministry/agency and other relevant public agencies and communities for comments.

⁸⁸ Annex 1 of the Environment Protection and Management Law of Liberia (EMPL):
<https://www.epa.gov.lr/sites/default/files/ENVIRONMENTAL%20AND%20MANAGEMENT%20LAW%2020III.pdf>

N°	Process stage	Description
		After receiving comments from stakeholders on the report, the EPA will constitute a Committee (Environmental Assessment Committee) to review the report. The committee will comprise technical experts from the Agency and sector agencies /ministries, a representative from the project, and also a representative from the project area. The body will give its opinions to the EPA for consideration.
7	Decision making	<p>Following the review of the EIA Report and considering comments received during the review period, the EPA will decide on the proposed project. The EPA may:</p> <ul style="list-style-type: none"> - Approve the project unconditionally; - Approve the application conditionally; - Request for further study and/or submission of additional detail; or - Reject the application if the project is likely to cause significant or irreversible damage to the environment.
8	Environmental License or Permit	<p>The issuance of the EIA permit/ license will be made within the time period specified below for different categories of projects:</p> <ul style="list-style-type: none"> - For projects not requiring an EIA, 15 days from the date of decision indicated in communication to the applicant. - For projects requiring an EIA, three months following receipt of the EIA Report.
9	Follow-up	<p>The EPA should undertake follow-up actions after the issuance of EIA permits:</p> <ul style="list-style-type: none"> - to ensure that the terms and conditions of approval are met; - to monitor the impacts of development and the effectiveness of mitigation measures; - to strengthen future EIA applications and mitigation measures and where required; and - to undertake environmental audit and process evaluation to optimize environmental management.

Sanctions related to the violations of environmental provisions⁸⁹

The Act establishing the EPA (2002) provides for the imposition of penalty for violation of any provision of the Law or any regulation made thereunder as required. Section 56 of the same Act provides that any violation for which no other penalty is specifically provided, is punishable, upon conviction, by a general penalty of not more than US\$ 50,000 or an imprisonment not exceeding 10 years.

Generally, as provided under the Environmental Protection and Management Law (EPML), a penalty for violation of any provision is pre-set under such provision. Interestingly, each pre-set penalty is enclosed within a mandatory framework, above which the EPA lacks the authority to fine.

⁸⁹ <https://epa.gov.lr/wp-content/uploads/2024/10/Act-Establishing-the-Liberia-EPA.pdf>

Additionally, Section 53.2(d) of the Act gives the Agency the authority to make regulations providing for fees and levies to be charged in the enforcement of the Act.

In fulfilment of this mandate, the EPA has established a procedural mechanism by which:

- alleged violators are engaged;
- response to each suspected or reported violation is done based on the immediate impact or potential impact of the violation;
- the response may range from warning letter to revocation of permit, penalty and imprisonment; and
- all penalties must be within the statutory allowable range.

4.17. Energy transition in Liberia

Energy transition in Liberia focuses on moving from dependence on traditional energy sources, such as biomass and fossil fuels, to modern, sustainable, and cleaner energy solutions. Like many developing nations, Liberia faces challenges in energy access, particularly in rural areas, where many households rely on firewood and charcoal for cooking and lighting.

The Government is prioritizing renewable energy, including solar, hydropower, and small-scale mini-grids, as part of its commitment to reducing greenhouse gas emissions and enhancing energy security. Key initiatives include expanding off-grid and decentralized solutions, leveraging Liberia's hydropower potential, and collaborating with international partners to finance renewable energy infrastructure.

Despite notable progress, challenges persist, including limited financing, insufficient grid infrastructure, and a shortage of skilled personnel in the energy sector. Nevertheless, Liberia's energy transition offers significant potential for economic growth, improved living standards, and environmental sustainability.

4.17.1. National commitments to energy transition

Liberia has made a series of commitments to the global energy transition, with a focus on increasing the share of renewable energy, improving energy access, and addressing climate change. Below are some of the key actions and commitments made by the Government of Liberia:

Rural & Renewable Energy Agency

The Rural and Renewable Energy Agency (RREA) is an independent agency that was established by act of the executive order No.23 of January 2010, which turned into law by the National Legislature in July 2015, and is mandated to facilitate and accelerate the economic transformation of rural Liberia by promoting the commercial development and supply of modern energy products and services to rural areas through the private sector and community initiatives with an emphasis, but not necessarily exclusive reliance, on locally available renewable resources. The missions of the RREA, as provided by the act to establish the RREA of 6 July 2015 are as follows :

- promote improved access to modern energy services in the rural areas of Liberia;
- facilitate and accelerate the economic transformation of rural Liberia by promoting the development and supply of modern energy products and services to rural areas with an emphasis on locally available renewable resources;
- introduce and promote the enactment of regulations and policies in the exercise of the functions of the Agency; and
- administer, secure, enforce, design and execute policies, strategies, plans and programs relating directly and indirectly to the functioning, growth and development of the rural energy sector.

The RREA also manages a Rural Energy Fund (REFUND) dedicated to the management of domestic and international financial resources intended for rural and renewable energy

delivery in the country, and that will facilitate and provide for the coordinated and sustainable financing of projects and programs for the delivery of modern energy services in Liberia's interior. However, the REFUND Committee, which should oversee RREA's donor-funded renewable energy fund, had never been formally constituted according to the RREA's annual report for 2024.⁹⁰

The RREA works in close collaboration with the local communities to discuss their needs and opportunities for such projects, as well as the private sector and community developers to investigate how these entities can be encouraged to bring electricity to the rural areas. In addition to training and outreach, the RREA is expected to provide financial support such as grants, subsidies and loan guarantees to rural communities and the private sector. Modern rural energy services have in the past been the stepchild in the support that the government has brought to the Liberian people⁹¹.

The RREA is required to develop a Rural Energy Strategy and Master Plan in collaboration with the MME, as provided by section 2.1 of the RREA Act, 2015. The Master Plan shall be formulated "on the basis of well-defined project selection and prioritization criteria designed to ensure enhanced energy access with equity, sustainable development and optimal use of indigenous and renewable resources, and ensure that these are integrated into the national energy Master Plan"⁹².

Rural Energy Strategy and Action Plan 2030

The strategy, covering the period from 2016 to 2030, aims to achieve a target of rural electrification of 35% by 2030 using renewable energy. The objective of setting a decentralized and equitable transition to a large-grid long term vision goes through the following :

- Electrification rate for the population outside of Monrovia of 10% in 2020, 20% in 2025 and 35% in 2030, electrifying the largest cities and towns of the country in the first run;
- All county capitals, health facilities and secondary schools electrified already before 2025;
- 10 largest settlements in each County to be electrified by 2030 with minimum electrification of 15% per County;
- More than 75% of all electricity generated from renewables by 2030 with 19% coming from other than large hydro: Mini-hydro, Solar and Biomass;
- Universal access to affordable solar lamps, efficient appliances and cook stoves; and
- Cooking gas available in all county capitals and efficiently produced charcoal widespread across the country.

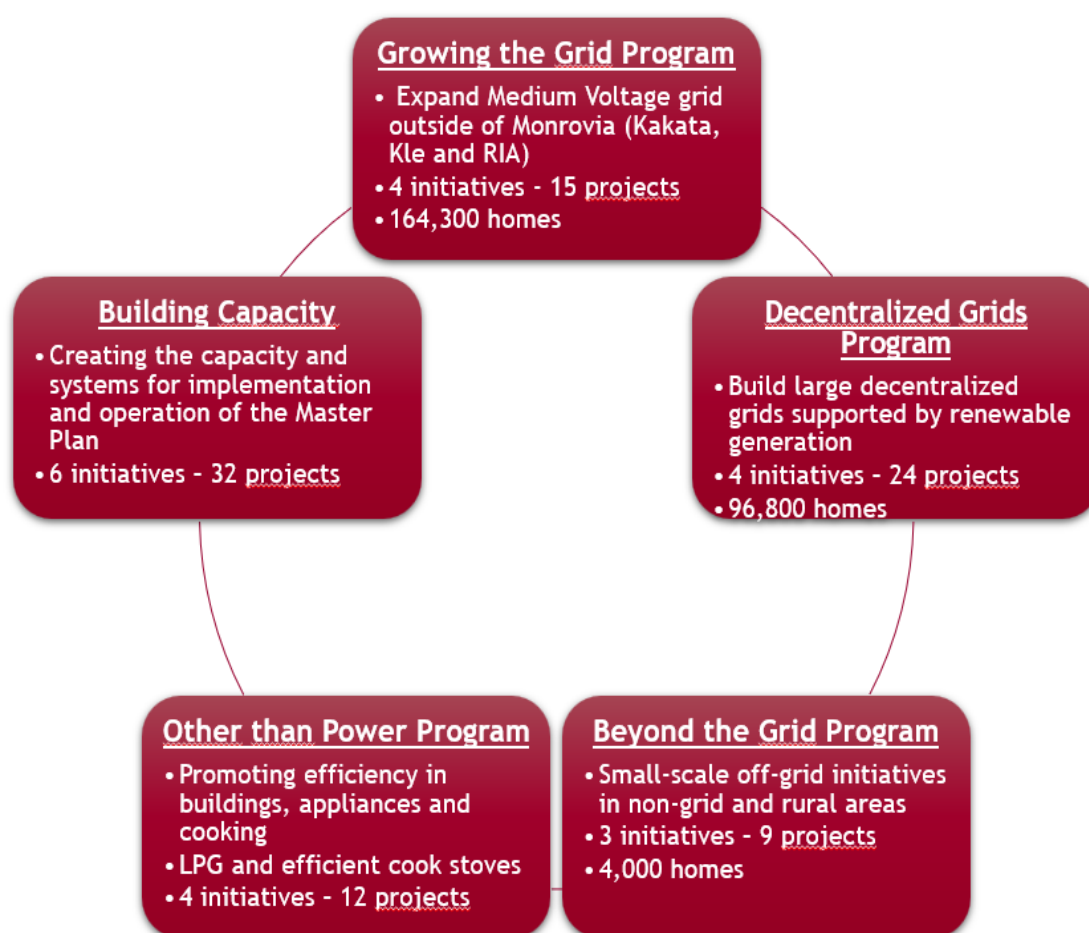
To achieve these objectives, the Master Plan articulates around five main headlines as presented in the chart below :

⁹⁰ https://www.rrealiberia.org/new/pg_img/RREA%202024%20Annual%20Report.pdf

⁹¹ https://www.rrealiberia.org/new/page_info.php?&7d5f44532cbfc489b8db9e12e44eb820=MTQw

⁹² https://www.rrealiberia.org/new/pg_img/Rural%20and%20Renewable%20Energy%20Agency%20Act,%202011.pdf

FIGURE 46: MASTER PLAN PROGRAMS



This ambitious plan requires funding worth US\$ 935 million, out of which US\$ 185 million were already committed from international partners such as the World Bank, the AfDB, the EU, USAID and the Swiss Embassy.⁹³

National Adaptation Plan 2020-2030

The Liberia's National Adaptation Plan 2020-2030 was developed by the EPA through a cooperative and consultative process that included stakeholders from the Government, the private sector, and civil society, with the support of the UNDP during the design, financing and implementation stages. The NAP provides a framework to the GoL to respond to the climate change effects on the key sectors of the country, including energy.

It is to be noted that seasonal and daily temperatures and precipitation changes would have a direct impact on the timing and size of peak electricity demands. For instance, very hot days and nights are already being observed in some parts of the country (e.g., Monrovia), increasing electricity demand to cool residences and businesses.

⁹³ <https://gestoenergy.com/wp-content/uploads/2018/04/LIBERIA-RURAL-ENERGY-STRATEGY-AND-MASTER-PLAN.pdf>

In addition, extended periods of drought could reduce water availability for hydropower generation, particularly in parts of the land projected to be heavily hit by increased temperatures, which are also origins of significant rivers in the country.

To face climate change impacts on the energy sector, the adaptation strategy set as part of the NAP 2020-2030 aims to improve energy efficiency and conservation and develop Liberia's domestic energy resources to facilitate private sector participation and investment in the new low-carbon energy sector. This adaptation strategy includes the following steps :

- Establish and promote a robust national program on solar energy (e.g., hybrid systems, installation of solar panels, promotion of solar street lighting, etc.) and other energy-efficient lighting technologies;
- Support the provision of energy-efficient technologies such as energy-efficient bulbs to provide power and lighting for schools and other public institutions and households as a means of enhancing or introducing energy-efficient technologies;
- Support the promotion and implementation of energy plantation schemes to minimize natural forest pressure and reduce energy stress;
- Develop a system to regulate the sustainable use of biomass energy;
- Promote and support the development and utilization of community-based off-grid/mini-grids;
- Conservation and protection of water catchments, including around hydropower and municipal water supply sources;
- Prevent sedimentation that could hinder the production of energy in hydroelectric facilities;
- Enhance implementation of an energy generation mix plan that increases the resilience of the current and future energy systems to the impacts of future climate variability and change; and
- Establish Protection of water catchment around hydropower sources.⁹⁴

Nationally Determined Contributions (NDCs) under the Paris Agreement (PA)⁹⁵

The Nationally Determined Contributions (NDC) consist of commitment of the signatory countries of the Paris Agreement to limit global warming and temperature increase, reduce greenhouse gas emissions and adapt to the impacts of climate change. Signatory countries are required to develop their NDC every five years and shall reflect quantifiable measures, including target, budget and timing, in order to achieve the overall objectives.

Liberia developed its first NDC in 2015 and covered the period 2015-2020, which was later updated in 2021. The table below shows the NDCs submitted by the GoL to the United Nations Framework Convention on Climate Change (UNFCCC) as part of its commitment to fulfil its obligations under the Paris Agreement:

⁹⁴ https://unfccc.int/sites/default/files/resource/LIBERIA_%20NAP_%20FINAL_%20DOCUMENT.pdf

⁹⁵ https://unfccc.int/sites/default/files/NDC/2022-06/Liberia%27s%20Updated%20NDC_RL_FINAL%20%28002%29.pdf

TABLE 95: LIBERIA NATIONALLY DETERMINED CONTRIBUTIONS (NDCS)

Document	Submission date	Link
Liberia's Intended Nationally Determined Contributions (NDC 1.0)	27/08/2018	Link
Liberia's Revised Nationally Determined Contributions (NDC 2.0)	01/08/2021	Link
Final report stock take of the Liberia's Second Nationally Determined Contributions (NDC 2.0)	26/02/2025	Link

The second NDC covers mitigation actions for agriculture, coastal zone, energy, health, forestry, transport and industry, and waste management. This version also presents the progress made on the Revised NDC 1.0.

The planned actions previewed in the NDC 2.0 covering the energy sector for the period 2021-2030 total 22 interventions for a total estimated cost of US\$ 147 million. These actions are detailed in the table below:

TABLE 96: PROGRESS ON THE NDC IMPLEMENTATION PLAN

Output	Implementation year	Status
Implement measures to monitor and track emissions from the energy sector, through the establishment of SEEA Energy Accounts to be implemented by Liberia Institute of Statistics and Geo Information Services (LISGIS), in coordination with several governmental agencies. Note: Energy accounts are part of the System of Environmental Economic Accounts (SEEA) Central Framework and organize energy-related statistics, recording physical flows of energy between the environment and the economy and assets, including quantity of mineral and energy resources and changes in these resources over an accounting period. Energy accounts are important to inform policies on renewable energy use and are an input to the calculation of air emission accounts.	2023	Conservation International has begun engaging LISGIS and sectoral MACs through the National Capital Accounting Project to develop Liberia's NCA strategy. There is no emissions tracking system from energy sector at the MME
Technical assistance in the sector of ETS - Climate Finance.	2021	No activities implemented for ETS-Climate Finance
Technical Assistance in data collection and MRV.	2021	UNEP is supporting the Biennial Transparency Report. A system has been established to collect emission data on the different sector and reported via EPA/UL. The West Africa MRV for Climate Action program implemented by NovaSphere is providing technical guidance for MRV across Liberia.
Development of a Full package of PPA enabling legal acts, procedures and training	2021	The discussion around this subject has been included in the discourse for finalizing the climate change law

Output	Implementation year	Status
Review and development of a new Grid Code in line with the new approached: regulated electricity sector; unbundling; TSOe - Transport Service Operator of Electricity.	2021	The Liberia Electricity Regulatory Commission has developed a Grid Code addressing unbundling; TSOe, etc.
Review and expansion of the legal acts related to Electricity Regulation and Unbundling - financial resources for independent high standard Regulatory Commission "The Regulator	2021	MME has developed a mini-grid policy for Liberia. A Policy for electricity distribution was adopted in 2022.
Improvement of the legal framework for PPA - Power Purchasing Agreements, including drafting standard Agreements.	2021	No specific legal framework exists for PPA.
Assessment and auction mechanism for IPPs	2021	There is an energy compact for Liberia that includes provisions addressing IPPs. It is being rolled out by LERC.
To support the distribution of energy-saving cook stoves, implement a campaign to increase awareness to promote the use of energy-efficient cook stoves and regulate its use	2021	UNDP is supporting the production of cookstove in Liberia through its energy and environment unit. Projects are supported under the small grants program and periodically support local organizations. The society for environmental conservation is running a cookstove project across Liberia impacting mainly rural communities.
Reduce total electricity loss to 10% by 2025 through the improvement of the distribution network (technical losses) and the implementation of a social tariff (non-technical losses)	2021	On October 11, 2022, President Weah issued Executive Order No: 111 Exempting LEC from paying custom Duty. This was intended to reduce cost of electricity. Currently, Liberia is reporting around 27% loss of electricity.
Construction of a 10 MW capacity projects developed with IPP - PPA in PV, medium size hydro.	2022	A new solar farm for 70MW is being negotiated under IP arrangement by LEC for completion in 2026. There is a 16 million funding commitment for a 20MW solar farm at Mt. Coffee Hydro by the Government of Liberia. The Rural Energy for Electrification in Liberia (REEL) project, with funding from AfDB, has been launched for the construction of Gbedin mini-hydro averaging 9.8 MW. The Liberia Renewable Energy Access Project (LIRENAP), with funding from the World Bank, is constructing 2.5MW hydropower plant plus 1.8MW diesel facility as backup, 115km of 33kV T&D network and service connections in Lofa County
Construction of a 100 MW capacity large hydro under development with IPP - PPA.	2022	Half of the funding to construct a 150MW hydro at St. Paul-2 is underway

Output	Implementation year	Status
		with half of the funding already committed by World Bank.
Establishment of real costs and tariffs calculated for the 3 segments of the unbundled sector: generation, transmission distribution.	2021	LERC has issued regulations on tariff calculation. This is currently being used for the 3 sectors.
Assessment and establishment of social subsidies.	2021	The 2022 social tariff approved by the LERC is currently being utilized. However, LERC has, based on LEC intention, set 31st January 2025 as the deadline for the resubmission of a new Tariff Application proposal.
Review and expansion of the legal acts related to Electricity Regulation and Unbundling - financial resources for independent high standard Regulatory Commission “The Regulator”	2021	There is no plan to expand the current Electricity Law.
Completion of the reconstruction of 80% of HHs by 2025.	2021	Not yet started
Develop a policy to Stop Stealing Electricity.	2021	There is no specific policy on power theft. However, there is major campaign by the LEC and the enactment of a law against power theft.
Adopt legal provisions and law enforcement mechanisms for penal actions against electricity thefts	2021	A new Power theft law was enacted in 2019 specifically amending section 15.88 of the penal law, thereby upgrading the crime to second degree felony.
Technical assistance to the Rural & Renewable Energy Agency for connections	2021	All projects at the Rural Renewable Energy Agency implemented by AfDB, World Bank or the government, has a technical assistance component.
10 MW Capacity medium HPP constructed with 50% base load minimum for Rural Electricity and connected to the Grid.	2021	<p>A new solar farm for 70MW is being negotiated under IP arrangement by LEC for completion in 2026.</p> <p>There is a 16 million funding commitment for a 20MW solar farm at Mt. Coffee Hydro by the Government of Liberia.</p> <p>The Rural Energy for Electrification in Liberia (REEL) project, with funding from AfDB, has been launched for the construction of Gbedin mini-hydro averaging 9.8 MW.</p> <p>The Liberia Renewable Energy Access Project (LIRENAP), with funding from the World Bank, is constructing 2.5MW hydropower plant plus 1.8MW diesel facility as backup, 115km of 33kV T&D network and service connections in Lofa County</p>

Output	Implementation year	Status
10 MW Capacity PV Plants.	2021	<p>A new solar farm for 70MW is being negotiated under IP arrangement by LEC for completion in 2026.</p> <p>There is a 16 million funding commitment for a 20MW solar farm at Mt. Coffee Hydro by the Government of Liberia.</p> <p>The Rural Energy for Electrification in Liberia (REEL) project, with funding from AfDB, has been launched for the construction of Gbedin mini-hydro averaging 9.8 MW.</p> <p>The Liberia Renewable Energy Access Project (LIRENAP), with funding from the World Bank, is constructing 2.5MW hydropower plant plus 1.8MW diesel facility as backup, 115km of 33kV T&D network and service connections in Lofa County</p>
Development of a roadmap and implementation program to speed up the program to produce and distribute 280,543 energy saving cook stoves and 308,004 solar lamps.	2021	There is no roadmap developed to produce and distribute energy cookstove. Yet, there are on-going projects in the country.

Source: Stocktake of Liberia's 2021 Nationally Determined Contributions (NDC 2.0)

International partnerships

The NDC Partnership is a global coalition counting more than 240 countries and institutions working together to achieve ambitious climate goals under the Paris Agreement, to which Liberia became a member since 2018 through its Environment Protection Agency EPA.

Since joining the Partnership, Liberia has requested support related to mainstreaming NDCs into national/subnational planning and budgeting; capacity building and knowledge products; preparation of NDC related projects and pipelines for investment; and the mobilization of financial resources for NDC investment projects.

Several international partners are presenting their continuous support towards the energy transition and implementation of NDC in Liberia and that are presented in the figure below:⁹⁶

FIGURE 47: INTERNATIONAL PARTNERS SUPPORTING THE ENERGY TRANSITION AND NDC IMPLEMENTATION IN LIBERIA



⁹⁶ <https://ndcpartnership.org/country/lbr>

As part of its participation in the Africa Energy Summit “Mission 300” in Tanzania in January 2025, Liberia submitted its National Energy Compact proposal that shows a set of commitments towards providing electricity to 100,000 households per annum, increasing thus the electricity access in the country from 32.7% actually to 75% by 2030. The compact also aims to raise the country’s renewable energy share to 75% through hydro resource development, a 20MW solar PV plant at Mt. Coffee, and 70MW of solar PV and Battery Energy Storage Systems (BESS) via an independent power purchase model⁹⁷.

The summit organized by the African Development Bank and World Bank as well as other international partners afforded an envelope of more than US\$ 50 billion to the 12 participating countries⁹⁸. Although there were no confirmations of the fundings granted to Liberia, it is believed that the country has benefited from a share of the envelope.

4.17.2.Key frameworks to the energy transition in Liberia

Liberia has developed several legislations, policies and plans to support its energy transition and improve access to sustainable energy. Below are key frameworks

TABLE 97: KEY FRAMEWORKS TO THE ENERGY TRANSITION IN LIBERIA

Key Frameworks	Description
Laws and regulations	
<u>Electricity Law of Liberia, 2015</u>	Primary legislation governing Liberia’s electricity sector. It unbundled the Liberia Electricity Corporation (LEC) monopoly, allowed private sector participation through Independent Power Producers (IPPs), and established the Liberia Electricity Regulatory Commission (LERC) as an independent regulator overseeing licensing, tariffs, and sector standards.
<u>Rural and Renewable Energy Agency (RREA) Act, 2015</u>	Establishes the Rural and Renewable Energy Agency as an autonomous government agency tasked with promoting improved access to modern energy services in rural areas of Liberia. The Act outlines the Agency’s objectives, functions, governance structure, and funding mechanisms.
<u>Public Procurement and Concessions Act, 2005 (amended 2010)</u>	Provides the framework for public-private partnerships and concessions, including those in energy infrastructure. It ensures transparency and accountability in awarding contracts for renewable energy projects.
<u>Electricity Mini-Grid Code, 2022</u>	Establishes the regulatory framework for developing and operating mini-grids, supporting rural electrification and the expansion of renewable energy. It sets standards for licensing, safety, and service quality, ensuring mini-grids contribute effectively to Liberia’s energy transition.
<u>Statutory Rules and Orders - Electrical Wiring Regulations, 2023</u>	Sets mandatory safety, technical, and operational standards for electrical installations in Liberia. It ensures safe wiring practices, protects people and property, and supports reliable electricity distribution in line with the country’s energy transition.

⁹⁷ <https://www.mfdp.gov.lr/index.php/media-center/press-release/liberia-submits-national-energy-compact-proposal-for-financing-at-africa-energy-summit-in-tanzania>

⁹⁸ <https://energyalliance.org/mission-300-africa-energy-summit-secures-historic-country-commitments-and-over-50-billion-in-partner-pledges-to-accelerate-action-on-affordable-sustainable-energy-growth/>

Key Frameworks	Description
Policies, National plans & Strategies	
<u>National Energy Policy (NEP), 2009</u>	Provides the overarching framework for reform and development of Liberia's energy sector. It emphasizes universal access, renewable diversification (hydro, solar, biomass, wind), reduced reliance on fossil fuels, and private sector participation.
<u>National Energy Efficiency Action Plan (NEEAP), 2015</u>	Aims to improve energy efficiency across Liberia's power generation, transmission, and end-use sectors. Focus areas include efficient lighting, industrial and commercial energy use, reducing technical and commercial losses, and promoting energy-efficient appliances and practices. The plan also supports capacity building, awareness campaigns, and regulatory measures to help the country transition to more sustainable and cost-effective energy consumption.
<u>Climate Change Policy and Response Strategy, 2018</u>	Provides a framework for low-carbon development and climate resilience in Liberia. It promotes renewable energy, sustainable forestry, emission reductions from land use and energy, and climate adaptation measures. The policy also emphasizes capacity building, technology adoption, and integrating climate considerations into national development planning to support Liberia's energy transition.
<u>Rural Energy Strategy and Master Plan (RESMP), 2016-2030</u>	Outlines a roadmap to expand rural electricity access in Liberia through mini-grids, standalone solar, and small hydropower. Sets targets, supports private sector engagement, and promotes community participation to advance the country's energy transition.
<u>Pro-Poor Agenda for Prosperity and Development (PAPD), 2018-2023</u>	Liberia's national development strategy prioritizes access to affordable and reliable energy as a driver of economic growth and poverty reduction. It promotes investment in renewable energy, regional power trade, and supports sustainable energy solutions for both urban and rural communities.
<u>National Energy Compact (2025)</u>	Submitted at the Africa Energy Summit, this initiative targets 75% electricity access and a 75% renewable energy share by 2030. It focuses on hydropower expansion, solar plus storage projects, and accelerating Liberia's energy transition through sustainable, decentralized solutions.

4.17.3. Carbon pricing mechanisms in Liberia

The carbon market in Liberia is still in its very first stages, as current activities are limited to voluntary carbon markets and natural resource-based carbon offset projects. Nevertheless, the GoL is undergoing major structural reforms to regulate the carbon market by developing formal mechanisms as a step forward towards compliance to its international commitments.

Legal and regulatory framework

Liberia has not yet established a dedicated authority regulating the carbon market, as well as a carbon market registry and a carbon pricing mechanism⁹⁹. As such, the LRA -in collaboration with the FDA- is mandated by the National Climate Change Steering Committee to lead the carbon governance framework. In this perspective, according to various media sources, the EPA has developed a National Carbon Market Policy that aims to provide a broader vision and guiding principles ruling the participation of the country in the carbon market schemes. It is also believed that the EPA is working on a draft climate change law that should complete the policy.

According to the same resources, the EPA is organizing numerous consultations and meetings to socialize the new policy, alongside training currently underway with government officials and technician staff from numerous agencies on carbon accounting, benefit-sharing mechanisms and compliance procedures to Article 6 of the 2015 Paris Agreement on climate change.¹⁰⁰

Despite of the absence of a carbon pricing mechanism, section 604 (b) of the Liberia Revenue Code provided for a Royalty for Carbon Credits calculated at a rate of 10% of the carbon credit value generated from companies operating in the renewable resources¹⁰¹. The code did not provide any revenue transfer formula or mechanism in regard to this royalty.

Voluntary participation in the carbon market ¹⁰²

According to the West African Alliance on Carbon Markets and Climate Finance, Liberia counts two registered projects within the voluntary carbon market as well as another project under validation as presented in the table below:

TABLE 98: VOLUNTARY CARBON MARKET PROJECTS

Name	Standard	Status	Main category
Improved Cookstoves In Liberia	VCS	Registered	Household
HPP Project Liberia	VCS	Registered	Renewable Energy
Mount Coffee hydropower project	GCC	Under validation	Renewable Energy

Source: West African Alliance on Carbon Markets and Climate Finance

Although no data is available on the household project's carbon credits and retirements, the renewable energy registered project recorded issued credits of 13.81 kt against 8.58 kt of retired credits in 2023.

Partnerships and agreements

In September 2024, the GoL signed a letter of engagement with the Coalition for Rainforest Nations with an objective of empowering carbon trading initiatives that will particularly

⁹⁹ <https://westafricanalliance.org/our-countries/liberia/>

¹⁰⁰ https://www.liberianobserver.com/liberia-drafts-national-carbon-market-policy/article_a49c0c06-9cd7-452c-b833-fea51def1515.html

¹⁰¹ <https://revenue.lra.gov.lr/wp-content/uploads/2021/08/REVENUE-CODE-LIBERIA-REVENUE-CODE-AMENDEMENT-2020-min.pdf>

¹⁰² <https://westafricanalliance.org/our-countries/liberia/>

benefit communities living near the forests while also unlocking new avenues for climate finance to support national development goals. This collaboration that will last for the period 2024-2026 will afford technical support to enhance the country's capacity for monitoring, reporting, and verifying greenhouse gas (GHG) emissions. In addition, the coalition will allow the GoL strengthen the institutional framework to prepare for results-based payments through platforms such as REDD+ and ITMOs. Key areas of focus will include developing the Forest Reference Emission Levels (FREL), improving the National GHG Inventory, and ensuring adherence to international reporting standards essential for engaging in the carbon market, as well as developing its Biennial Transparency Report (BTR) and the necessary technical annex required by the United Nations Framework Convention on Climate Change (UNFCCC), positioning Liberia to identify its carbon potential and establish a solid National Forest Reference Emission Level (FREL)¹⁰³.

According to media sources, the GoL signed a memorandum of understanding with the Dubai-based company Blue Carbon for the exclusive rights to generate and sell carbon credits on about 2.5 million acres of Liberia's forests, representing 10% of the country's land area for 30 years. As such, the company will retain 70% of the revenue from the sale of carbon credits. However, concerns arose by international conservation groups regarding the potential harm to wild spaces leased out to the company. Indigenous groups are worried about what the MoUs might mean for their rights to the land and sceptics of carbon credits have repeated long-standing concerns about the ability of carbon credit markets to have any effect at all on carbon emissions¹⁰⁴.

It should be noted that the GoL has been engaging since 2007 on the readiness project REDD+ referred to in section 4.1.3 of this report that aims to reduce GHG and generate carbon credits which can be sold in the international market.

¹⁰³ <https://epa.gov.lr/liberia-sets-its-sights-on-the-global-carbon-market-a-game-changing-partnership-with-the-coalition-for-rainforest-nations/>

¹⁰⁴ <https://thebreakthrough.org/journal/no-20-spring-2024/land-grabs-for-carbon>

4.17.4. Main renewable energy projects in Liberia

The GoL has engaged in several renewable energy projects that are presented below:

TABLE 99: MAIN ONGOING AND COMMITTED RENEWABLE ENERGY PROJECTS IN LIBERIA¹⁰⁵

Development partner	Project name	Timeline	Project Description	Funding (including private sector)	Access to Electricity	Access to Clean Cooking	Renewable Energy Installed
World Bank	Liberia Electricity Sector Strengthening and Access Project (LESSAP)	2021-2030	A 10-year Multiphase Programmatic Approach to increase access to electricity and improve the operational efficiency of LEC. Phases 1 and 2 are under implementation and Phase 3 is expected to commence in 2026.	US\$ 200 million (including ESMAP: US\$ 7.5 million and PHRD: US\$ 2.7 million)	1.250 million people (~250,000 connections)	-	70 MW (solar PV) from the private sector
World Bank	Regional Emergency Solar Project Intervention (RESPITE) + Additional Finance	2023-2027	Liberia component of this regional project to strengthen regional integration aims to increase grid connected renewable energy capacity, support the preparation of new renewable energy projects and establish the River Basin Authority	US\$ 96 million	-	-	Solar: 20 MWp Hydro: 64 MW
World Bank	Liberia Renewable Energy Access Project (LIRENAP)	2016-2025	Decentralized electrification in Lofa County, technical assistance to strengthen RREA and regulations, and market development of solar home systems	US\$ 27 million	150,000 people (30,000 connections)	-	-
AfDB	REEL Project	2027	Infrastructure investments (generation capacity, distribution network, substation, and cross-border transmission line)	UAC 24.4 million	60,000 people with improved electricity access; 37,880 with new connections	-	-

¹⁰⁵ <https://thedocs.worldbank.org/en/doc/9347b2293d056364000ec88b532670fb-0010012025/original/M300-AES-Compact-Liberia.pdf>

Development partner	Project name	Timeline	Project Description	Funding (including private sector)	Access to Electricity	Access to Clean Cooking	Renewable Energy Installed
AfDB and EU	LEEAP	2019-2024	Transmission line, substations, and distribution network	UAC 31.4 million	30,700 connections	-	-
AfDB and EU	CLSG-RE	2022-2025	Distribution network along the CLSG line in Nimba, Bong, Rivercess, and Grand Bassa counties	UAC 17.9 million	24,000 connections	-	-
Sweden	Beyond the Grid Fund Africa	2019-2030	RBF for DRE solutions	US\$ 10 million	400,000 people	-	-
Sweden	Renewable Energy and Climate Adaptation Technologies (REACT) Sub-Saharan Africa (SSA) Program	2017-2026	Provision of grants to renewable energy businesses, and access to clean fuels and cook stoves	US\$ 5 million	30,000 households	-	0.3 MW
EU	Construction of the Mini-Hydro Power Plant in Greenville including the rehabilitation of the feeder road	2024-2027	Construction of hydropower plant in Sinoe County; Construction of 2 MW HPP and 33 kV transmission network in Greenville	€ 10.8 million	12,057 connections	-	-
EU	Implementation of a Solar PV Plant in Greenville	2024-2028	Construction of 850 KW solar PV plant	€ 2.6 million	5,249 connections	-	-
EU	Supervision of works in Buchanan, Greenville, and Barclay Ville	2024-2027	Supervisory service for all southeastern projects	€ 3.2 million	Supervisory services	-	-
EU	Construction of the distribution network in Greenville Lot 2 and Buchanan	2024-2027	Transmission line, substations, and distribution network	€ 6.5 million € 6.5 million	5,249 connections 12,057 connections	-	-

Development partner	Project name	Timeline	Project Description	Funding (including private sector)	Access to Electricity	Access to Clean Cooking	Renewable Energy Installed
EU	Implementation of a solar PV power plant in Greenville	2024-2027	Construction of 850 KWP solar PV plant	€ 2 million	1,200 connections	-	200 KWp solar
EU	Technical assistance to RREA	2024-2026	Technical assistance	€ 1 million	-	-	-
GIZ	Energising Development (EnDev)	2023-2025	Energy access for vulnerable communities, including electricity and cleaner cooking for households, social institutions, and medium and small-sized enterprises	€ 6.9 million	40,000 connections (solar home systems) 303 health facilities	24,000 connections 100 schools 10 medium and small-sized enterprises	-
USAID	MCHPP Retrofit of Units 2, 3, and 4	2023-2024	Installation of surge protection and fire-detection equipment needed to stabilize generation capacity and extend life	US\$ 850,000	-	-	-
USAID	Empower West Africa	2024-2029	Increase equitable access to affordable, reliable, and clean energy in 18 West African countries through collaboration between the public and private sectors	US\$ 73 million regional (Liberia included)	-	-	-
Rockefeller Foundation /GEAPP	M300 Technical assistance	March 1, 2025-September 30, 2026	Development of LEC Network Planning Manual	US\$ 800,000	~112,273 connections		

4.18. Environmental impact of extractive activities

4.18.1. Overview

Liberia is one of the wettest countries in the world, with the heaviest rainfall occurring from May to October. The country's average annual rainfall approximates 2,500 mm. Rainfall is highest along the coast, but decreases towards Liberia's interior plateaus and low mountains, where average rainfall reaches approximately 2,030 mm per year. Southern areas of the country receive rain year-round, while the rest of the country experiences two seasons due to the West African Monsoon. The dry season typically occurs from December to April, and is characterized by the harmattan winds with average temperatures between 24 to 27°C. Relative humidity reaches 90%-100% during the rainy season and 60%-90% during the dry season.

The country is highly vulnerable to adverse effects of climate change and environmental instability due to its extreme poverty and high dependence on 'climate sensitive' sectors such as agriculture, forestry, fisheries, and energy and mining. Additional contributing factors to the country's vulnerability to climate change conditions include mal-adapted agricultural activities, unsustainable logging practices, unregulated coastal sand mining, an overdependence on biomass leading to high levels of deforestation, inadequate infrastructure, low level of socio-economic development, low institutional capacity and inadequate meteorological and hydrological data and data gathering capabilities.

Despite having one of the highest rates of water resources per capita in Africa, water quality and sanitation remain poor in some areas due to mining (e.g. iron ore pollutants), farming (e.g. agrochemical runoff) and industrial activities (e.g. discharge from rubber processing).

According to estimates, around 95 km² of land in the coastal zone of Liberia will be inundated in the event of one-meter sea level rise by 2100, with half of it due to inundation on the sheltered coast and shoreline retreat. Major cities such as Monrovia, New Kru Town, River Cess, Buchanan and Roberts port are not safe from infrastructure and land damage. Rapid coastal erosion (both from sea level rise and sand mining) already puts settlements and infrastructure at risk, specifically for Buchanan, Greenville, Harper and Robert sport communities. Similarly, increased precipitation will impact vulnerable zones of forests and biodiversity and may see increased incidence of flooding and erosion due to deforestation and habitat degradation.

Liberia is endowed with significant primary energy sources, including biomass, hydroelectricity, petroleum and renewable energy resources and these plays a crucial role in the development of Liberia's economy. It is also a major component of Liberia's infrastructure and supports economic activities and social development. However, most of this infrastructure is damaged and outdated. For instance, approximately 95% of the population relied on biomass for energy needs as of 2012. This has also led to uncontrolled production of charcoal, causing significant deforestation and biodiversity degradation. The country's electricity generation is through portable generators and hydro-power plants.¹⁰⁶

¹⁰⁶ https://climateknowledgeportal.worldbank.org/sites/default/files/2021-07/15917-WB_Liberia%20Country%20Profile-WEB%20%281%29.pdf

Despite the national effort to face climate change and reduce its impacts to the extent possible, the country still has limited resilience and adaptive capacity to combat the effects of climate change. The low adaptive capacity in the country is exacerbated by both climate change and non-climate change impacts. Adaptation to increasing climate variability and change is important in Liberia. However, Liberia still suffers from resource gaps and policy barriers to effectively tackle climate change. It remains a high-risk country in terms of disasters, resulting in possible economic, epidemic disease outbreak, environmental and socio-economic losses.¹⁰⁷

4.18.2. Liberia's Nationally Determined Contribution¹⁰⁸

Liberia became a member of the UN Framework Convention on Climate Change in 2002 through the signature of the Kyoto Protocol as part of its consciousness of the climate change implications on the country and the importance of taking preventive actions reducing these impacts to the extent possible. As such, the revised Nationally Determined Contribution elaborated by the EPA in July 2021 presented a set of mitigation and adaptation measures covering several sectors, from which a selection of those in relation to the extractive sector is summarized in the table below:

TABLE 100: NDC MITIGATION AND ADAPTATION MEASURES

Sector	Mitigation measure	Adaptation measure
Agriculture	<ul style="list-style-type: none"> Reduce agricultural GHG emissions by 40% below BAU levels by 2030 (reduction of 13 GgCO₂e) through promoting low-emissions rice cultivation and reducing the burning of field residues. Reduce GHG emissions from the livestock sector by 40% below BAU levels by 2030 (reduction of 211 GgCO₂e) through incentivizing improved feed, e.g., with legume fodder species, to reduce enteric fermentation (reduction of 103 GgCO₂e), improved waste management, e.g. with bio-digesters and composting (reduction of 108 GgCO₂e). 	<ul style="list-style-type: none"> Develop incentives and programs to promote crop and livestock diversification, climate resilient seeds, Integrated Pest Management (IPM), water harvesting, irrigation systems, increased soil fertility Develop facilities and climate smart technologies to promote postharvest and value addition practices, including establishment of 5 seed/gene banks and improved storage facilities for agricultural products, based on Liberia's five agricultural regions, by 2030

¹⁰⁷ <https://liberia.un.org/sites/default/files/2020-10/UNCDF%20Liberia-Digital%20Version.pdf>

¹⁰⁸ https://epa.gov.lr/wp-content/uploads/2024/10/Liberias-Updated-NDC_RL_FINAL-002.pdf

Sector	Mitigation measure	Adaptation measure
Forest	<ul style="list-style-type: none"> ▪ Reduce the national deforestation rate by 50% by 2030 ▪ Reduce GHG emissions from forest conversion by 40% below BAU levels by 2030 (Reduction of 5,147 GgCO₂e in 2030). ▪ Reforest an average of 12,285 ha per year to enhance forest carbon stocks by 1,013 GgCO₂e in 2030, including through natural regeneration and tree planting through community and school programs. ▪ Restore 25% of priority degraded forests by 2030. ▪ Enhance carbon stocks by 600 Gg CO₂e through annual carbon sequestration in the urban canopy and the planting of additional trees in urban green corridors. 	<ul style="list-style-type: none"> ▪ Catalogue 100% of water catchments in forest areas, with 50% of these under sustainable management plans by 2030 (Link to Agriculture sector) ▪ Develop alternative livelihoods programs with forest dependent people in 5 forested counties to ensure a just transition from forest extractive models for local communities, including development of models and markets for non-timber forest products and for sustainable eco-tourism by 2030. (Linked to Mitigation target).
Energy	<ul style="list-style-type: none"> ▪ Reduce GHG emissions from energy sector (excluding transport sector) by 40.6% below BAU levels by 2030. ▪ Produce and distribute energy saving cook stoves to reduce the use of fuel wood and charcoal (Link to Forest sector). 	<ul style="list-style-type: none"> ▪ Create private investment enabling environment focusing on Power Purchase Agreement (PPA) in renewables. ▪ Reconnection of Monrovia clients to the grid, supporting the process by which the owners of individual generators will switch to the distribution network. ▪ Development of off grid small Hydro Power Plants and on grid ones via PPAs. ▪ Develop large photovoltaic (PV) Plants with Independent Power Producers (IPPs) by signing PPAs

Source: EPA's NDC 2021

The EPA estimates that the implementation of the planned measures will have a total investment around US\$ 490 million, almost US\$ 460 million of them should be mobilized from the private sector. It also estimates that US\$ 400 shall be dedicated to achieving mitigation target, while the remainder should be required to achieve adaptation targets by 2025. The full implementation of the planned targets would result in economic benefits around US\$ 3.2 bn, alongside with generating significant returns for the global climate, Liberia's economy, and the well-being of its citizens.

4.18.3.ESG reporting in the extractive sector

Extractive companies are required to conduct an Environmental Impact Assessment prior to obtaining a license, in accordance with the provisions set out in Section 4.16.2 above. However, there is no legal requirement for companies to prepare and submit annual environmental and social compliance reports. It is understood that some extractive companies in Liberia, particularly multinational enterprises, follow international

environmental, social and governance standards, mainly in response to investor expectations or lending conditions:

- IFC Performance Standards (Environmental and Social Sustainability);
- Global Reporting Initiative (GRI) Standards;
- Sustainability Accounting Standards Board (SASB) Metrics;
- International Cyanide Management Code (for gold mining); and
- OECD Guidelines for Multinational Enterprises.

These frameworks provide structured ESG disclosures covering environmental impact, social performance, and corporate governance.

As agreed by the MSG, extractive companies were required to provide their latest information about ESG matters. Out of 16 in-scope extractive companies, only mining companies **“ARCELOR MITTAL LIBERIA LTD”**, **“BEA MOUNTAIN MINING, INC”**, **“WESTERN CLUSTER LIMITED”** and **“CHINA UNION INVESTMENT”** submitted their ESG report.

The company **“ARCELOR MITTAL LIBERIA LTD”** submitted its environmental monitoring report for the last quarter of 2023, which includes the assessment of the impact of the company’s operations on the environment in relation to temperature and precipitations, surface and groundwater quality, noise, and air quality. The samples tested show some exceedances of sediments levels in the analysed water samples from Buchanan site compared to the used standards.

The report provided by **“BEA MOUNTAIN MINING, INC”** consists of an ESIA report established by the consulting company ABS Africa in February 2024 and covers the Matambo open pit mine. Despite of some minor low to medium-impact deviations in terms of ground and surface water, soils and lang capability, air quality, noise and blasting impact, the report considers that impacts identified are not considered to be fatal flaws.

The report submitted by **“WESTERN CLUSTER LIMITED”** consists of the first environmental audit report prepared by an independent environmental consultancy firm and submitted to the LPA, for the purpose of the renewal of the company’s Bomi Hill Concession operating permit that expired in June 2024. According to the report, the company is said to be compliant with environmental best practices, with limited risks of vibration, Dust, noise, flying particles of rocks, air pollution related to the blasting activity.

The Environmental and Social Impact Assessment provided by **“CHINA UNION INVESTMENT”** contains data relating to 2012. Therefore, we are not able to conclude on the reliability of the information provided.

4.19. The fight against corruption in Liberia

Liberia has established a legal and institutional framework to combat corruption and strengthen governance across public and private sectors. These mechanisms address multiple dimensions of corruption, including public sector integrity, financial accountability, asset management, and the prevention of illicit enrichment. Key institutions and legislation provide oversight, investigation, and enforcement powers to detect and prosecute corrupt practices, while promoting transparency and ethical standards. The Government of Liberia

has demonstrated its commitment to fighting corruption through the development of strategic plans and sectoral policies aimed at enhancing accountability, improving public service delivery, and safeguarding national resources from improper use.

4.19.2. Key Frameworks for Anti-corruption in Liberia

Liberia has established several legislations, strategies and plans to support its anti-corruption efforts. The key frameworks include:

TABLE 101: KEY FRAMEWORKS FOR ANTI-CORRUPTION IN LIBERIA

Framework	Description
General Anti-Corruption & Governance Laws	
<u>Liberia Anti-Corruption Commission (LACC) Act, 2022</u>	<p>The Liberia Anti-Corruption Commission (LACC) Act, 2022, establishes Liberia's main anti-corruption body. It:</p> <ul style="list-style-type: none"> - Sets up LACC as an independent commission to investigate and prosecute corruption. - Defines offences such as bribery, embezzlement, abuse of office, and illicit enrichment. - Gives LACC powers to investigate, freeze assets, and prosecute offenders. - Promotes transparency and ethics through public education and prevention programs. - Protects whistleblowers and witnesses reporting corruption. - Applies across all sectors, including mining, petroleum, forestry, and agriculture.
Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) Act, 2021	<p>This law repealed and replaced the 2012 AML/CFT Act, significantly strengthening Liberia's framework against money laundering, terrorist financing, and proliferation financing.</p> <p>The 2021 AML/CFT Act modernizes Liberia's response to money laundering and terrorism financing by expanding the scope of offences, explicitly criminalizing proliferation financing, and extending oversight to virtual assets and service providers. It introduces stronger mechanisms for freezing, seizing, and confiscating illicit assets, and establishes an Inter-Ministerial Committee to coordinate policy implementation. The Act obliges financial institutions to conduct customer due diligence, maintain records, and report suspicious transactions, while empowering regulators to enforce compliance. By closing legal loopholes and enhancing international cooperation, the law makes it more difficult for corrupt actors to conceal or legitimize illicit proceeds.</p>
Financial Intelligence Agency (FIA) Act, 2022	<p>The FIA Act repealed and replaced the Financial Intelligence Unit (FIU) Act of 2010, transforming Liberia's financial intelligence function into an independent statutory agency. The Act establishes the Financial Intelligence Agency (FIA) with authority to analyze suspicious transactions, enforce AML/CFT compliance, and coordinate with domestic and international partners. By enhancing autonomy, oversight, and investigative powers, the law strengthens Liberia's ability to combat financial crimes and corruption more effectively.</p>
Whistleblower Act, 2022	<p>This Act protects individuals in public and private institutions who report wrongdoing, including corruption, maladministration, or threats to health, safety, or the environment. Whistleblowers are safeguarded from dismissal, harassment, or any retaliatory action, provided their disclosure is made in good faith. The law encourages reporting while limiting liability for those who act under its provisions.</p>
Witness Protection Act, 2021	<p>The Witness Protection Act establishes measures to safeguard individuals providing testimony or evidence in serious criminal cases, including corruption</p>

Framework	Description
	and organized crime. It sets up a Witness Protection Unit within the Ministry of Justice to ensure confidentiality, safety, and support for protected witnesses, encouraging reporting and strengthening the integrity of legal proceedings.
Code of Conduct Act, 2014	The Code of Conduct Act establishes ethical standards for public officials and is one of Liberia's most important integrity laws. It requires asset declarations to prevent illicit enrichment, prohibits conflicts of interest by restricting certain business dealings, and prescribes disciplinary measures for violations. By setting out behavioral expectations for those in public service, the law strengthens public confidence in government institutions and reduces opportunities for corruption in official decision-making.
Public Financial Management Act, 2009	The Public Financial Management Act strengthens oversight and accountability in the use of state funds by setting clear rules for budgeting, expenditure control, financial reporting, and audits. Its provisions apply to all ministries, agencies, and sectors, including those managing natural resource revenues, thereby reducing opportunities for embezzlement and misuse. The law has become a cornerstone of Liberia's fiscal governance framework, aiming to ensure that public resources are used transparently and in line with development priorities.
Revenue Code of Liberia, 2000	The Revenue Code consolidates taxation and royalty obligations across all sectors, providing a consistent framework for government revenue collection. It is designed to reduce discretionary practices in tax administration by establishing uniform rules and procedures, particularly in relation to extractive industries where revenue leakage is historically high. By mandating compliance, disclosure, and penalties for under-reporting, the Code strengthens transparency in state income and helps close avenues for corruption in revenue flows.
Public Procurement and Concessions Act, 2010	The Public Procurement and Concessions Act (PPCA) provides the legal framework for procurement and concession agreements in Liberia, embedding transparency and accountability into public contracting. It requires open and competitive bidding processes, prohibits favoritism and collusion, and establishes oversight through the Public Procurement and Concessions Commission. Non-compliance can result in sanctions and contract cancellation, making the Act a key tool for reducing corruption risks in infrastructure projects, public supply contracts, and concession agreements.
Sector Specific Laws	
Minerals and Mining Law, (2000)	The Minerals and Mining Act provides the legal framework for Liberia's mining industry and has been central in embedding transparency into the sector. It establishes clear licensing procedures to reduce discretionary decision-making, requires public disclosure of royalties and concession agreements. The Act also introduces penalties for bribery, illegal mining, and other corrupt practices, ensuring that revenues from mineral exploitation are tracked and channeled to the state rather than diverted through opaque arrangements.
Petroleum (Exploration and Production) Act (2014) and as Amended in 2019	The Petroleum Act governs the exploration and production of oil and gas, incorporating important safeguards against corruption in this high-value industry. It mandates competitive bidding for petroleum contracts, disclosure of agreements to the public, and strict adherence to good governance principles. By criminalizing fraudulent practices in licensing and contract negotiations, the Act reduces the risks of secretive deals and strengthens public oversight of Liberia's petroleum sector;
The 2006 National Forestry Reform Law (NFRL 2006)	The Forestry Reform Law integrates anti-corruption measures directly into forest governance. It requires all logging concessions to be allocated transparently through public tenders and obliges companies to report revenues from timber sales, which are subject to oversight by civil society and local communities. The

Framework	Description
	law also allows for cancellation of contracts obtained through bribery or misrepresentation, thereby reducing corruption risks and ensuring forest resources are managed sustainably for national benefit.
<u>Liberia Agriculture Commodity Regulatory Authority Act (2014)</u>	This Act establishes the Liberia Agriculture Commodity Regulatory Authority (LACRA) to regulate and promote the production, processing, and marketing of key agricultural commodities. It includes governance and accountability provisions to ensure transparency in operations, prevent mismanagement of funds, and reduce corruption in the administration of agricultural programs. LACRA is required to maintain proper financial records, report publicly on its activities, and implement oversight mechanisms.
Strategies & Plans	
<u>Liberia Anti-Corruption Commission (LACC) Strategic Plan (2019-2024)</u>	The 2019-2024 Strategic Plan sets out the Liberia Anti-Corruption Commission's priorities and operational objectives for combating corruption. It focuses on strengthening the Commission's capacity to investigate, prosecute, and deter corrupt practices, enhancing governance across public and private sectors. The Plan also emphasizes preventive measures, public education campaigns, institutional capacity building, and promoting transparency, thereby supporting Liberia's overall anti-corruption framework.
<u>LACC Abridged Strategic Plan (2021-2025)</u>	This Strategic Plan builds on earlier initiatives by providing a condensed, focused roadmap for LACC operations. It highlights key programs to improve investigative efficiency, enhance sectoral oversight, and foster public awareness of corruption risks. While it proposes measures to strengthen existing laws and policies, its primary role is to guide LACC's operational strategy, ensuring accountability, transparency, and integrity in both governmental and private institutions.
<u>Pro-Poor Agenda for Prosperity and Development (PAPD), 2018-2023</u>	The PAPD (2018-2023), integrates anti-corruption measures as a core element of its governance pillar. It emphasizes strengthening public institutions, enhancing transparency, and promoting accountability across all sectors. The Plan calls for improved financial management, robust oversight of public programs, and citizen engagement to reduce misuse of public resources, thereby supporting Liberia's broader efforts to prevent corruption and ensure that development benefits reach the population equitably.

4.19.2. Key Institutions for Anti-Corruption in Liberia

[Liberia Anti-Corruption Commission \(LACC\)](#)

The Liberia Anti-Corruption Commission (LACC) is an independent body established under the LACC Act, 2022. Its primary role is to prevent and combat corruption across public and private sectors, promoting transparency, accountability, and ethical standards in governance.

The LACC is mandated to:

- Investigation and Prosecution: Investigate alleged corruption offences and prosecute individuals involved in bribery, embezzlement, fraud, or other corrupt acts.
- Prevention of Corruption: Advise government agencies on reducing corruption risks, monitor compliance, and promote transparent decision-making.
- Asset Recovery: Identify and recover assets obtained through corrupt practices.
- Public Engagement and Education: Raise awareness of corruption risks and educate citizens on reporting misconduct.

- Whistleblower and Witness Protection: Safeguard individuals who report corruption from retaliation.
- Advisory and Policy Development: Support the government in strengthening anti-corruption laws and institutional frameworks.

Financial Intelligence Agency (FIA)

The Financial Intelligence Agency (FIA) was established under the Financial Intelligence Act, 2020. It is responsible for detecting, investigating, and preventing financial crimes, including money laundering and financing of terrorism.

The FIA is mandated to:

- Collection and Analysis of Financial Information: Receive, analyze, and interpret financial data to detect suspicious transactions.
- Dissemination of Intelligence: Share findings with law enforcement, regulators, and other authorities for investigation and action.
- Compliance Monitoring: Oversee banks and other reporting entities to ensure adherence to anti-money laundering and counter-terrorism financing standards.
- Capacity Building and Awareness: Train stakeholders and raise public awareness on financial crime risks.
- Asset Recovery: Assist in tracing and recovering illicit financial assets.
- International Cooperation: Collaborate with global counterparts to combat financial crimes.

General Auditing Commission

The General Auditing Commission oversees public financial management, ensuring accountability and proper use of state resources.

They are mandated to:

- Audit of Public Accounts: Review financial statements of ministries, agencies, and public enterprises.
- Performance Audits: Evaluate the efficiency, effectiveness, and economy of government programs.
- Fraud and Mismanagement Investigations: Identify irregularities and refer cases for further investigation.
- Advisory and Capacity Building: Support government institutions in improving financial management and internal controls.
- Support Anti-Corruption Efforts: Work with the LACC and other bodies to detect and prevent corruption.

Public Procurement and Concessions Commission (PPCC)

The PPCC regulates procurement and concessions under the Public Procurement and Concessions Act, 2010, ensuring fair, transparent, and competitive processes.

The PPCC is mandated to:

- Regulation and Oversight: Monitor government procurement activities for compliance.
- Policy Development: Issue guidelines and best practices for procurement processes.
- Monitoring and Auditing: Review contracts and procurement reports to detect irregularities.
- Capacity Building: Train procurement officers and stakeholders on proper procedures.
- Facilitating Open Bidding: Ensure fair and competitive tendering.
- Dispute Resolution: Investigate procurement complaints and adjudicate disputes.
- Anti-Corruption Measures: Collaborate with the LACC to prevent corrupt practices in procurement.

Parliamentary Oversight Committees

Parliamentary Oversight Committees monitor the executive branch and public institutions to ensure accountability, transparency, and proper use of resources.

They are mandated to:

- Oversight of Government Agencies: Monitor ministries, agencies, and public bodies for compliance with laws and budgets.
- Review of Public Expenditure: Assess the use of public funds in key sectors.
- Examination of Audit Reports: Analyze findings from audits and recommend corrective action.
- Investigating Complaints: Review concerns from the public, civil society, or whistleblowers.
- Monitoring Implementation of Laws: Ensure government adherence to legislation and regulations.
- Public Hearings and Engagement: Conduct hearings and engage stakeholders for transparency.
- Enhancing Accountability: Promote integrity in government operations and decision-making.

4.19.2. Governance indices

The World Bank published the Worldwide Governance Indicators (WGI) with their latest update of 2023¹⁰⁹. The WGI are produced by Daniel Kaufmann from the Natural Resource Governance Institute (NRGI) and Brookings Institution and Aart Kraay from the World Bank Development Research Group.

Indicators are a research dataset summarizing the views on the quality of governance provided by many enterprises, citizen, and expert survey respondents in industrial and developing countries. These data are gathered from several interferants including survey

¹⁰⁹ <https://www.worldbank.org/content/dam/sites/govindicators/doc/wgidataset.xlsx>

institutes, think tanks, non-governmental organizations, international organizations, and private sector firms.

The WGI do not reflect the official views of the Natural Resource Governance Institute, the Brookings Institution, the World Bank, its Executive Directors, or the countries they represent.

WGIs are defined as presented in the table below:

TABLE 102: WORLD BANK GOVERNANCE INDICATORS (WGI)

N°	Indices	Description
1	Control of Corruption	Reflects perceptions of the extent to which public power is exercised for private gain, including both petty and grand forms of corruption, as well as "capture" of the state by elites and private interests.
2	Voice and Accountability	Reflects perceptions of the extent to which a country's citizens can participate in selecting their government, as well as freedom of expression, freedom of association, and a free media.
3	Political Stability - No Violence	Measures perceptions of the likelihood of political instability and/or politically motivated violence, including terrorism.
4	Government Effectiveness	Reflects perceptions of the quality of public services, the quality of the civil service and the degree of its independence from political pressures, the quality of policy formulation and implementation, and the credibility of the government's commitment to such policies.
5	Regulatory Quality	Reflects perceptions of the ability of the government to formulate and implement sound policies and regulations that permit and promote private sector development.
6	Rule of Law	Reflects perceptions of the extent to which agents have confidence in and abide by the rules of society, and in particular the quality of contract enforcement, property rights, the police, and the courts, as well as the likelihood of crime and violence.

Source: World Bank

The rankings of Liberia by index are presented in the table below:

TABLE 103: LIBERIA'S WGI EVOLUTION BETWEEN 2012 AND 2022

N°	Indices	2022			2012		
		Highest country	Liberia	Lowest country	Highest country	Liberia	Lowest country
1	Control of Corruption	Denmark Rank 1 Score = 100	Rank 170 Score = 20.28	South Sudan Rank 211 Score = 0	Denmark Rank 1 Score = 100	Rank 143 Score = 32.70	Somalia Rank 212 Score = 0
2	Voice and Accountability	Norway Rank 1 Score = 100	Rank 112 Score = 46.38	Korea, Dem. Rep. Rank 214 Score = 0	Norway Rank 1 Score = 100	Rank 134 Score = 37.56	Turkmenistan Rank 214 Score = 0
3	Political Stability - No Violence	Cayman Islands Rank 1 Score = 100	Rank 137 Score = 35.85	Syria Rank 213 Score = 0	Greenland Rank 1 Score = 100	Rank 145 Score = 31.75	Somalia Rank 212 Score = 0

N °	Indices	2022			2012		
		Highest country	Liberia	Lowest country	Highest country	Liberia	Lowest country
4	Government Effectiveness	Singapore	Rank 196	South Sudan	Finland	Rank 187	Somalia
		Rank 1	Score = 8.02	Rank 211	Rank 1	Score = 11.85	Rank 212
		Score = 100		Score = 0	Score = 100		Score = 0
5	Regulatory Quality	Singapore	Rank 178	Korea, Dem. Rep.	Singapore	Rank 180	Korea, Dem. Rep.
		Rank 1	Score = 16.51	Rank 211	Rank 1	Score = 15.17	Rank 212
		Score = 100		Score = 0	Score = 100		Score = 0
6	Rule of Law	Finland	Rank 172	Somalia	Norway	Rank 170	Somalia
		Rank 1	Score = 19.34	Rank 214	Rank 1	Score = 20.66	Rank 214
		Score = 100		Score = 0	Score = 100		Score = 0

4.19.3. Corruption Perceptions Index

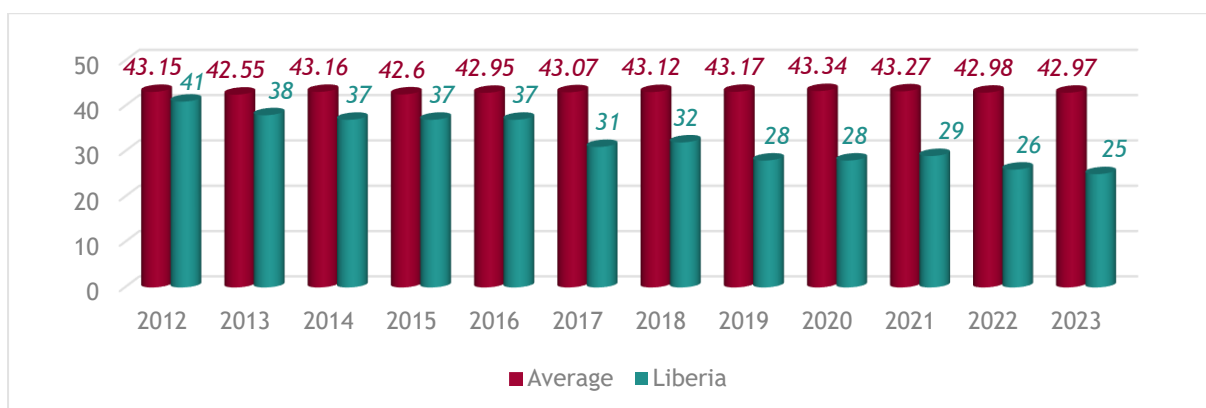
The Corruption Perceptions Index (CPI) is an index which ranks countries by their perceived levels of corruption, as determined by expert assessments and opinion surveys. The CPI generally defines corruption as an "abuse of entrusted power for private gain". The index is published annually by the non-governmental organization Transparency International (TI) since 1995 and uses a scale from 0 (highly corrupt) to 100 (very clean).

In the most recent data, Liberia was ranked 145th out of 180 countries in 2023, with a score of 25, falling below the global average (43). Denmark, Finland, New Zealand, Norway, Singapore, Sweden and Switzerland are perceived as the least corrupt nations in the world, ranking consistently high among international financial transparency, while the most apparently corrupt are Somalia (scoring 12), followed by Syria and South Sudan (both scoring 13).

The global average remains stable during the period from 2012 to 2023 at approximately 43 out of 100. More than two-thirds of countries score below 50, while 53 countries have fallen to their lowest scores yet. Despite concerted efforts and hard-won gains by some, 157 countries have made no significant progress against corruption or have declined since 2012.

The evolution of the Liberia's score between 2012 and 2023 is presented in the graph below:

FIGURE 48: LIBERIA'S CPI EVOLUTION BETWEEN 2012-2023



Source: [Transparency International](https://www.transparency.org/en/cpi)

4.19.4. Anti-corruption policy in the extractive sector

As agreed by the MSG, extractive companies were required to provide their anti-corruption policy. Out of 16 in-scope extractive companies, only “WESTERN CLUSTER LIMITED”, “LIBERIAN AGRICULTURAL COMPANY” and “LIBINC OIL PALM, Inc” submitted their anti-corruption policy. These cover the main aspects in relation to bribery, gifts and other benefits applicable rules, third-party relationships, monitoring and review as well as whistleblowing channels and mechanisms.

4.20. Notes towards Gender Sensitive LEITI Reporting and Implementation

4.20.1. Legislative & Policy Framework for Gender Equality in Liberia

Gender equity is among the primary concerns for Liberian officials. In fact, the Ministry of Gender, Children and Social Protection that was established in 2013 in replacement of the Ministry of Women and Children Affairs, aims to “achieve gender equality, equity, the empowerment of women and girls, promoting the survival and development of children, thus ensuring their rights” through policy formulation, coordination and monitoring & evaluation of the issues related to these topics as part of the Liberian development agenda.¹¹⁰

The Liberian 1986 constitution does not provide for an article specifically dedicated to women's rights and gender equality; however, all the articles of the chapter III related to fundamental rights establish for equal rights with no discrimination of any kind among Liberian citizens. Besides, the article 8 of the constitution states that “*The Republic shall direct its policy towards ensuring for all citizens without discrimination, opportunities for employment and livelihood under just and humane conditions, and towards promoting safety, health and welfare facilities in employment*”.¹¹¹

The Liberian government set numerous policies and enrolled in various programs that target gender equality and women's rights. These components of the regulatory framework are referenced in the table below:

TABLE 104: GENDER EQUALITY-RELATED POLICIES AND PROGRAMS

Policy /Program	Year	Description
National Gender-Based Violence Plan of Action	2006	<p>The action plan is in the Phase III of the Gender-Based Violence National Action Plan (GBV-NAP) 2018- 2023 and consists of the revised version of previous Phase II implemented from 2011 to 2016 that summarizes the intervening concept points towards the prevention and management of GBV in Liberia.</p> <p>This instrument is in direct response to SGBV across Liberia, building on the successes, improving on the pitfalls and incorporating emerging issues stemming from the implementation in the previous phase. As such, this new phase of the NAP merged GBV interventions into three critical pillars: Psychosocial & Coordination, and Health.</p>

¹¹⁰ [About Us - Ministry of Gender Children and Social Protection \(mogcsp.gov.lr\)](#)

¹¹¹ The 1986 constitution of the Republic of Liberia - Article 8

Policy /Program	Year	Description
<u>Global Joint Program on Accelerating Progress toward the Economic Empowerment of Rural Women</u>	2014-2020	<p>The joint program implemented by the United Nations is a global initiative with a goal to secure rural women's livelihoods, rights and resilience in the context of sustainable development and has four objectives:</p> <ul style="list-style-type: none"> - Improved food security and nutrition; - Increased income, decent work and economic autonomy; - Enhanced participation and leadership in rural life and institutions; - More gender-responsive policy environment.
<u>Decent Work Act</u>	2015	<p>The act aims to:</p> <ul style="list-style-type: none"> - Promote the attainment of decent work in Liberia, by establishing a regulatory environment which facilitates: <ul style="list-style-type: none"> i) continuing and further creation of quality employment; ii) the ability of all to exercise their rights at work; iii) a measure of social protection; and iv) participation in institutions and processes of social dialogue. - Ensure respect for, and the protection and fulfilment of fundamental rights at work in Liberia, including fundamental rights that are protected by the Constitution of Liberia. - Contribute to the enhancement of the human capabilities of all who work in Liberia. <p>Promote economic development and growth that can be shared throughout Liberia. These rights are guaranteed to all workers irrespective of gender, ethnicity, occupation, social status, political affiliation or opinion, or any other kind of discrimination.</p>
<u>National Gender Policy (Revised)</u>	2017	<p>The revised version of the 2009 National Gender Policy is implemented between 2017-2022 and seeks to address the following issues:</p> <ul style="list-style-type: none"> - strengthen the NGP existence to ensure coordination of gender mainstreaming work; - pay close attention to boys and young men under priority on vulnerable groups; - strengthen the role of civil society as part of the coordination and mainstreaming priority with the Ministry of Gender, Children & Social Protection; - ensure teenagers accessibility to services, education and programs set by the Government against teenage pregnancy to allow them to return to schools; and - focus on child labor and the negative impact of mining activities on boys through interventions towards education of boys.
<u>Revised Liberia Women Manifesto</u>	2017	<p>The Manifesto aims to ensure that women are aware of aspects associated with elections and how women can use their knowledge and skills to become involved. It also provides the foundation for women to understand and undertake strategies which will include them in the governance of Liberia.</p>

Policy /Program	Year	Description
<u>Pro-Poor Agenda for Prosperity and Development</u>	2018	<p>The new agenda aims, among its goals, to reduce gender inequality and empower women and girls by:</p> <ul style="list-style-type: none"> - enhancing inclusiveness of women and girls to reduce inequalities in political, social, and economic life; - investing in gender-responsive policies to reduce the number of girls who are out of school; - rolling out gender-responsive training and curriculum including Sexual and Gender Based Violence (SGBV); - raising awareness on the national Gender Policy in schools and other institutions of learning; develop and implement a policy for boys who impregnate girls; - enhancing public awareness and sensitization on Gender Based Violence (GBV) issues; Access to gender sensitive psychosocial, health and legal services nationwide; - supporting women-led CSOs working for engendering the peace and security actor and prioritize community-based approaches to sustain the peace and include women in decision-making in the security sector; and - promoting and support sustainable and gender sensitive use of natural resources.
<u>Land Rights Act</u>	2018	<p>As part of its objectives, the law that was implemented to organize the way land ownerships and rights are granted to citizens. As part of its objectives, it aims to ensure equal access and equal protection with respect to land ownership, use and management regardless of gender, identity, ethnicity or otherwise. Therefore, the Act provides that each Resident of a Customary Land community, irrespective of gender, shall be entitled to some portion of the Residential Area for up to one Acre of land for exclusive possession and use as a residence.</p>

Other policies and programs targeted gender equality among their provisions such as:

- Poverty Reduction Strategy Paper (2008-2011);
- Policy on Girl Child Education (2006);
- HIV and AIDS Strategic Plan of Action (2007);
- National Health Policy and National Health Plan (2007);
- Food and Agricultural Policy (2007);
- Environmental Policy (2002);
- Civil Service Reform Strategy (2008);
- Gender Policy of the Liberia National Police;
- the National Action Plan on the UN Security Council Resolution 1325;
- Mental Health Policy (2009);
- Social Welfare Policy (2008); and
- Labor Policy and the Gender Policy of the Liberia National Police.¹¹²

¹¹² [Liberia National Gender Policy 2010-2015 EN.pdf \(oecd.org\)](#)

4.20.2. Statistics on gender parity in Liberia

Liberia is ranked 167th in the Gender Inequality Index with a band score of 0.646 according to the 2023 Human Development report established by United Nations Development Program, which is below the world average of 0.191. The main figures outlined from the UNDP data are presented in the table below:

TABLE 105: GENDER INEQUALITY INDEX¹¹³

Index	Liberia		World		Gap	
	Female	Male	Female	Male	Female	Male
Population with at least some secondary education	24.0%	46.5%	62.0%	70.2%	(38.0%)	(23.7%)
Labor force participation rate	46.0%	52.8%	48.5%	74.1%	(2.5%)	(21.3%)
Gender Inequality Index	0.646		0.455		0.191	

Source: UNDP Human Development Reports

More detailed statistics provided by UN Women are presented in the table below:

TABLE 106: OTHER GENDER PARITY STATISTICS¹¹⁴

Index	Women	Men	Total
1. No Poverty			
1.1.1 Employed population below international poverty line, by sex and age (%)	31.04	28.33	29.63
3. Good Health & Wellbeing			
3.1.1 Maternal mortality ratio (Per 100,000 live births)	652.34	-	-
3.4.1 Mortality rate attributed to cardiovascular disease, cancer, diabetes or chronic respiratory disease (probability)	19.8	15.4	17.8
3.7.2 Adolescent birth rate (per 1,000 women aged 15-19 years)	130.82	-	-
4. Quality Education			
4.2.2 Participation rate in organized learning (one year before the official primary entry age), by sex (%)	70.99	67.31	69.13
4.3.1 Participation rate in formal and non-formal education and training, by sex (%)	6.44	46.74	6.98
5. Gender Equality			
5.4.1 Proportion of time spent on unpaid domestic chores and care work, by sex, age and location (%)	6.29	2.58	-
5.5.1 Proportion of seats held by women in national parliaments (% of total number of seats)	10.96	-	-
5.5.2 Proportion of women in managerial positions (%)	52.54	-	-
8. Decent Work to Economic Growth			
8.3.1 Proportion of informal employment in non-agriculture employment, by sex (ILO harmonized estimates) (%)	92.38	83.41	97.3
8.5.2 Unemployment rate, by sex and age (%)	5.65	6.24	5.95

¹¹³ <https://hdr.undp.org/data-center/thematic-composite-indices/gender-inequality-index#/indicies/GII>

¹¹⁴ <https://data.unwomen.org/country/liberia>

Index	Women	Men	Total
8.5.2 Unemployment rate, by sex and disability (%)	5.65	6.24	5.95
8.6.1 Proportion of youth not in education, employment or training, by sex and age (%)	41.55	39.85	40.78
8.7.1 Proportion of children engaged in economic activity and household chores, by sex and age (%)	29.4	26.3	27.8
8.10.2 Proportion of adults (15 years and older) with an account at a financial institution or mobile-money-service provider, by sex (% of adults aged 15 years and older)	44.2	59.34	42.1

Source: UN Women

As presented above, only 6.44% of female youth are not enrolled in education, employment or training programs against 46.74% of male youth. Although the proportion of females occupying managerial positions represents 52%, their parliamentary representation is limited to 11%.

4.20.3. Statistics on gender parity in the extractive sector in Liberia

The table below presents the gender parity in the extractive sectors in FY 2023 according to the data obtained from the Ministry of Labor:

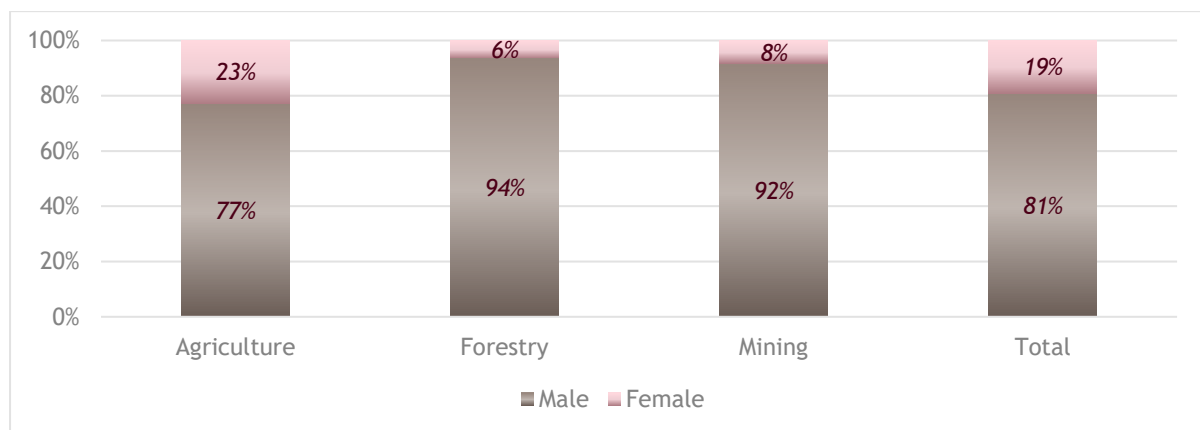
TABLE 107: GENDER PARITY IN THE EXTRACTIVE SECTOR IN LIBERIA

Sector	Male		Female		Total
Agriculture	7,197	77%	2,105	23%	9,302
Forestry	416	94%	28	6%	444
Mining	2,375	92%	212	8%	2,587
Total	9,988	81%	2,345	19%	12,333

Source: Ministry of Labor (MoL)

The graph below presents the gender parity by extractive sector:

FIGURE 49: GENDER PARITY BY SECTOR



As presented above, the extractive sector employment is male dominated by 81%, while female inclusion in extractive industries does not exceed 19% of total workers. Mining sector attracts mainly male workers as these represent 92% of workers in the sector, while agriculture is the most attractive sector for female workers with a 23% inclusion compared to 77% of male workers.

5. DEFINING THE RECONCILIATION SCOPE

The work included a general understanding of the extractive sector in Liberia. Government agencies were consulted in order to collect relevant information on the size of the extractive sector in Liberia, their contribution to the economy and to government revenues, as a part of the process for the LEITI MSG to agree on the scope for the reconciliation exercise for the period from 1 January to 31 December 2023.

5.1. Revenues flows

5.1.1. Direct payments

During the scoping phase, government agencies that received payment flows from the extractive sectors were consulted. The LEITI MSG agreed to include in the reconciliation scope the following payment flows:

TABLE 108: LIST OF DIRECT PAYMENTS INCLUDED IN THE RECONCILIATION SCOPE

Payment flows	Extractive companies	Government Agencies
Liberia Revenue Authority (LRA)		
1.1 WH (Res.) on salaries and wages	✓	✓
1.2 Royalties Gold and other base metals - Other (Agreements) (mineral mining)	✓	✓
1.3 Social contributions (mineral mining)	✓	✓
1.4 WH (RES.) ON PAYMENTS FOR SERV. RENDERED	✓	✓
1.5 Other import duties	✓	✓
1.6 Royalties Gold and other base metals 3% (mineral mining)	✓	✓
1.7 Other fees/licenses	✓	✓
1.8 ECOWAS trade levy	✓	✓
1.9 Admin. Penalties on WH non-residents	✓	✓
1.1 Presumptive (small tax) (4%)(200c)	✓	✓
1.11 Signature bonuses (mineral mining)	✓	✓
1.12 CIT Regular (25%)(200b2C)	✓	✓
1.13 WH (Res.) Of Income On Rubber Sales 4%	✓	✓
1.14 Customs user fees	✓	✓
1.15 Surface rental (agriculture)	✓	✓
1.16 Farm use in urban areas	✓	✓
1.17 ANNUAL VEHICLE REGISTRATION STICKER	✓	✓
1.18 Stumpage fees GoL share (FDA regulation 107-7 section 22b) (Forestry - FMCs)	✓	✓
1.19 Log and wood product export fee (FDA regulation 107-7 section 44-45) (Forestry - FMCs)	✓	✓
1.20 Area fees (forestry - FMCs)	✓	✓
1.21 Other fees (Forestry - FMCs)	✓	✓
1.22 GST on imported goods (excluding petroleum)	✓	✓

Payment flows		Extractive companies	Government Agencies
Social expenditure			
3.1	Mandatory social expenditure	✓	
3.2	Discretionary social expenditure	✓	
Environmental expenditure			
4.1	Mandatory environmental expenditure	✓	
4.2	Discretionary environmental expenditure	✓	
Infrastructure provisions and Barter arrangements			
5.1	Value of the benefit stream during the FY 2023	✓	✓
Subnational payments			
6.1	Any payment made by extractive companies to the affected communities	✓	
Subnational transfers			
7.1	Any transfer made by the Government to the affected communities from payments made by extractive companies		✓
Quasi-fiscal expenditure			
8.1	Quasi-fiscal expenditure made during the FY 2023		✓

5.1.2. Social and environmental expenditure

Social expenditure consists of all contributions made by extractive entities to promote local development and to finance social projects in line with EITI Requirement 6.1. This Requirement encourages the multi-stakeholder groups to apply a high standard of transparency to social payments and transfers, the parties involved in the transactions and the materiality of these payments and transfers to other benefit streams, including the recognition that these payments may be reported even though it is not possible to reconcile them.

These contributions can be voluntary or mandatory and can be made in cash or in kind, depending on individual contracts. This category includes, inter alia infrastructures relating to health or education, road and farming projects related to the promotion of agriculture, as well as grants provided to the population.

Requirement 6.1 states that: ‘Where material payments by companies to the government related to the environment are mandated by law, regulation or contract that governs the extractive investment, such payments must be disclosed.’

The LEITI MSG agreed to include the mandatory and discretionary social and environmental expenditure in the scope through unilateral disclosure by extractive companies. Social and environmental expenditure are detailed in Section 7.2.2 of this report.

5.1.3. State’s share of production and other in-kind revenues

EITI Requirement 4.2 states that: “Where the sale of the state’s share of production of oil, gas and/or mineral resources or other revenues collected in kind is material, the government, including state-owned enterprises, are required to disclose the volumes received and sold by the state (or third parties appointed by the state to sell on their behalf), the revenues received from the sale, and the revenues transferred to the state from the

proceeds of oil, gas and minerals sold. Where applicable, this should include payments (in cash or in kind) related to swap agreements and resource-backed loans.”

None of the government agencies confirmed receiving payments in kind from extractive entities during FY 2023.

The LEITI MSG agrees that this EITI requirement is not applicable to the Liberian context.

5.1.4. Subnational payments

EITI Requirement 4.6 states that: “It is required that the multi-stakeholder group establishes whether direct payments, within the scope of the agreed benefit streams, from companies to subnational government entities are material. Where material, the multi-stakeholder group is required to ensure that company payments to subnational government entities and the receipt of these payments are disclosed.”

The LEITI MSG agreed to include information on payments to sub-national government agencies through unilateral disclosure by extractive companies included in the reconciliation scope.

5.1.5. Sub-national transfers

EITI Requirement 5.2 states that: “Where transfers between national and subnational government agencies are related to revenues generated by the extractive industries and are mandated by a national constitution, statute or other revenue sharing mechanism, the MSG is required to ensure that material transfers are disclosed. Implementing countries should disclose the revenue sharing formula, if any, as well as any discrepancies between the transfer amount calculated in accordance with the relevant revenue sharing formula and the actual amount that was transferred between the central government and each relevant subnational entity.”

The LEITI MSG agreed to include information on direct sub-national transfers through unilateral disclosure by the relevant government agencies.

5.1.6. Quasi-fiscal expenditure

EITI Requirement 6.2 of the EITI Standard states that: “Where state participation in the extractive industries gives rise to material revenue payments, implementing countries must include disclosures from SOEs on their quasi-fiscal expenditures (QFE). The MSG is required to develop a reporting process with a view to achieving a level of transparency commensurate with other payments and revenue streams and should include SOE subsidiaries and joint ventures.”

The LEITI MSG has agreed that any public social expenditure such as payments for social services, public infrastructure, fuel subsidies and national debt servicing, etc. made by NOCAL i.e. outside of the national budgetary process is considered as QFE. NOCAL did not report any QFE during FY 2023.

5.2. Level of Disaggregation

The LEITI MSG agreed on the level of disaggregation by company for the EITI data by extractive entity selected in the scope and to present aggregated revenues collected from extractive entities that are not selected in the reconciliation scope.

5.2.1. Mining sector

The LEITI MSG agreed to include in the reconciliation scope mining entities holding active licenses and which make material payments exceeding the materiality threshold of US\$ 1,000,000. These account for **95.64%** of the total revenue collected by government agencies from entities operating in the mining sector during FY 2023.

Accordingly, the LEITI MSG agreed to include the following four (04) mining companies in the reconciliation exercise:

TABLE 109: LIST OF IN-SCOPE MINING COMPANIES

N°	TIN	Company name
1	500033821	Bea Mountain Mining, Inc.
2	500036301	Arcelor Mittal (Liberia) Ltd
3	500015636	Western Cluster Limited
4	500000376	China-Union Investment (Liberia) Bong Mines Co. Ltd

It is to be noted that the companies “Deko Mining Corporation” and “Ivanhoe Liberia Limited” are service companies that do not hold mining licenses to operate in Liberia, as presented in the table below:

TABLE 110: OUT OF SCOPE MINING COMPANIES

N°	Government agency	Suggestion	Payments (US\$)
1	Deko Mining Corporation	Subcontractor	585,207
2	Ivanhoe Liberia Limited	Transportation & logistics services	19,151
Total			604,358

According to the MME’s confirmation, the MSG agreed that “Deko Mining Corporation” and “Ivanhoe Liberia Limited” should not be considered as extractive companies as they have not been issued any mining license or concession to operate in Liberia.

The confirmation of the MME is provided in Annex 10 to this report.

Payment details of the aforementioned companies are presented in Annex 13 to this report.

5.2.2. Agriculture sector

The LEITI MSG agreed to include in the reconciliation scope agricultural entities holding active concession and which making material payments exceeding the materiality threshold of US\$ 500,000. These account for **92.57%** of the total revenues collected by Government Entities from entities operating in the mining sector during FY 2023.

Accordingly, the LEITI MSG agreed to include the following five (05) agriculture companies in the reconciliation exercise:

TABLE 111: LIST OF IN-SCOPE AGRICULTURE COMPANIES

N°	TIN	Company name
1	500017812	Firestone Liberia, LLC
2	500008555	Golden Veroleum Liberia Inc.
3	500012318	Liberian Agricultural Company
4	500021996	Cavalla Rubber Corporation
5	500009242	Libinc Oil Palm, Inc

5.2.3. Forestry sector

The LEITI MSG agreed to include in the reconciliation scope forestry entities holding active concession and which making material payments exceeding the materiality threshold of US\$ 100,000. These account for **86.74%** of the total revenue collected by government agencies from entities operating in the mining sector during FY 2023.

Accordingly, the LEITI MSG agreed to include the following seven (07) forestry companies in the reconciliation exercise:

TABLE 112: LIST OF IN-SCOPE FORESTRY COMPANIES

N°	TIN	Company name
1	500009992	Euro-Liberia Logging Company
2	500744117	West Water Group (Liberia), Inc.
3	500172868	Geblo Logging, Inc
4	500002882	Liberia Tree And Trading Company, Inc
5	501158267	Horizon Logging Limited
6	500905997	Kisvan Timber Corporation
7	500078809	West African Forest Development Incorporated (WAFDI)

It is to be noted that out of the seven companies above, we were informed by the FDA during the reconciliation exercise that the two (02) companies detailed in the table below are inactive during 2023 :

TABLE 113: LIST OF INACTIVE FORESTRY COMPANIES DURING THE REPORTING PERIOD

N°	Company name	Status	Payments (US\$)
1	Horizon Logging Limited	Inactive	196,354
2	West African Forest Development Incorporated (WAFDI)	Inactive	107,033
Total			303,387

The FDA confirmation of the inactivity of “**Horizon Logging Limited**” and “**West African Forest Development Incorporated (WAFDI)**” is presented in Annex 11 of this report.

Similarly, the company “Geblo Logging, Inc” has informed us that their harvesting certificate was denied by the FDA during 2023. Due to the financial difficulties faced, the company shut down its operations in 2023 and resumed activity in 2024. The payments reported by the LRA for the FY 2023 amount to US\$ 382,708.

During the scoping phase, the FDA confirmed that “**Stadium Inc.**” is a buyer and an exporter

company that does not hold a contract to operate in the forestry sector in Liberia, and therefore is out of scope of the LEITI 16th report.¹¹⁵ The LEITI MSG agreed that a separate section of the report should capture payments made by this company.

Detailed payments made by “Stadium Inc.” are provided in Annex 13 to this report. Those made by the other companies were presented in section 7.2.1 of this report as part of the unilateral disclosure by government agencies.

5.2.4. Oil and gas sector

According to the response received from Liberia Petroleum Regulatory Authority (LPRA), a Reconnaissance License was awarded to Canadian Global Energy (CGE) in September 2023.

Similarly, the LPRA disclosed license fees revenues for an amount of US\$ 550,000. However, these were not disclosed by LRA for the period from 1 January to 31 December 2023.

The LRA confirmed also that the reporting period does not account for any revenues from the oil and gas sector in the Tax Administration System.

The NOCAL disclosed revenues collected for an amount of US\$ 1,000,000 during the FY 2023 that relate to the seismic data sale to TGS provided by NOCAL.

The LEITI MSG agreed to exclude the above payment streams from the reconciliation scope of the oil and gas sector. The license fees reported by the LRA were included in the extractive revenue as part of the unilateral disclosure.

5.3. Government agencies

Based on the above proposed scope, the government agencies that were required to submit reporting templates are as follows:

TABLE 114: LIST OF GOVERNMENT AGENCIES WITHIN THE LEITI REPORTING PROCESS

N°	Government agency	Status
1	Liberia Revenue Authority (LRA)	Included in the reconciliation scope
2	Environmental Protection Agency (EPA)	Unilateral disclosure
3	National Port Authority (NPA)	
4	Ministry of Mines and Energy (MME)	
5	Ministry of Agriculture (MoA)	
6	Forestry Development Authority (FDA)	
7	National Oil Company of Liberia (NOCAL)	
8	Liberia Petroleum Regulatory Authority (LPRA)	
9	Ministry of Labor (MoL)	

¹¹⁵ The confirmation of the FDA is provided in the Annex 11 to this report.

5.4. Other Information in line with the EITI Standard

The LEITI MSG agreed that the following information should be included in the scope of the 2023 LEITI report as required by the EITI Standard:

- Legal framework and fiscal regime (EITI requirement 2.1);
- Contract and license allocations (requirement 2.2);
- Register of licenses (EITI requirement 2.3);
- Government's policy on disclosure of contracts and licenses (EITI requirement 2.4);
- Beneficial ownership (EITI requirement 2.5);
- State participation in the extractive industries (EITI requirement 2.6);
- An overview of the extractive industries, including any significant exploration activities (EITI requirement 3.1);
- Production data (EITI requirement 3.2);
- Export data (EITI requirement 3.3);
- Distribution of revenues from the extractive industries (EITI requirement 5.1); and
- Contribution of the extractive industries to the economy (EITI requirement 6.3).

5.5. Additional disclosure in the LEITI 2023 report

In accordance with the requirement 7.1 of the 2023 EITI standard and the ToR, the MSG agreed to include in the scope of the report and to the extent possible the additional information presented in the table below:

TABLE 115: ADDITIONAL INFORMATION INCLUDED IN THE FY 2023 IN THE LEITI REPORT

Topic	Additional information
Energy transition	An assessment of the implications of the transition to cleaner energy in the extractive sector and the actions already taken. This should include contextual and financial data on the impact of carbon pricing on revenues or commodity prices as well as the carbon price assumptions of operating companies in Liberia. A separate section will be dedicated to this matter.
Corruption risks	An assessment of the corruption index in Liberia and the measures taken from the GoL to mitigate this risk.
Gender equality	An assessment of the gender parity and the measures taken from the GoL towards gender equality.
Environmental impact of extractive activities	We will assess Liberia's commitments including efforts to preserve the environment and reduce the impact of the extractive sectors on the environment.

6. RECONCILIATION RESULTS

This section presents the detailed results of the reconciliation exercise, including differences noted between amounts paid by extractive companies and received by government agencies. The tables below highlight the amounts initially reported and the adjustments made following the reconciliation work, as well as the final amounts and unreconciled differences.

6.1. Payment Reconciliation between extractive companies and government agencies

6.1.1. Reconciliation by extractive company

The table below summarizes the differences between the payments reported by extractive entities and receipts reported by government agencies. It includes consolidated figures based on the reporting templates prepared by each extractive company and government agency, adjustments made by us following our reconciliation work and the remaining unreconciled differences. Details of the adjustments made are presented in Section 6.2 of this report and to keep the report size reasonable, detailed reporting templates for each company have been included in Annex 8 to this report.

TABLE 116: RECONCILIATION BY EXTRACTIVE ENTITY

Amounts in US\$

No.	Company	Templates originally lodged			Adjustments			Final amounts		
		Company (a)	Govt (b)	Difference (c) = (a - b)	Company (d)	Govt (e)	Difference (f) = (c-d)	Company (g) = (a+d)	Govt (h) = (b+e)	Difference (i) = (g-h)
1	Arcelor Mittal (Liberia) Ltd	44,032,779	27,029,813	17,002,966	(4,097,549)	12,702,991	(16,800,540)	39,935,230	39,732,804	202,426
2	Bea Mountain Mining, Inc.	52,134,532	33,479,754	18,654,778	(17,258,007)	(9,765)	(17,248,242)	34,876,525	33,469,989	1,406,536
3	China-Union Investment (Liberia) Bong Mines Co. Ltd	5,404,867	5,550,190	(145,323)	-	-	-	5,404,867	5,550,190	(145,323)
4	Western Cluster Limited	6,787,326	10,094,615	(3,307,289)	-	(4,000,000)	4,000,000	6,787,326	6,094,615	692,711
5	Cavalla Rubber Corporation	676,403	619,230	57,173	(52,525)	908	(53,433)	623,878	620,138	3,740
6	Firestone Liberia, LLC	5,738,470	5,609,025	129,445	(129,347)	-	(129,347)	5,609,123	5,609,025	98

No.	Company	Templates originally lodged			Adjustments			Final amounts		
		Company (a)	Govt (b)	Difference (c) = (a - b)	Company (d)	Govt (e)	Difference (f) = (c-d)	Company (g) = (a+d)	Govt (h) = (b+e)	Difference (i) = (g-h)
7	Golden Veroleum Liberia Inc.	2,276,907	1,958,404	318,504	(331,946)	-	(331,946)	1,944,962	1,958,404	(13,442)
8	Liberian Agricultural Company	1,417,783	1,568,978	(151,195)	(108,522)	-	(108,522)	1,309,262	1,568,978	(259,716)
9	Libinc Oil Palm, Inc	1,064,307	629,828	434,479	1,879	298,538	(296,659)	1,066,186	928,366	137,820
10	Euro-Liberia Logging Company	1,131,808	853,569	278,240	(281,313)	(1,293)	(280,020)	850,495	852,276	(1,780)
11	Geblo Logging, Inc	-	382,685	(382,685)	-	-	-	-	382,685	(382,685)
12	Horizon Logging Limited	-	196,354	(196,354)	-	-	-	-	196,354	(196,354)
13	Kisvan Timber Corporation	208,139	182,236	25,903	(9,494)	(1,701)	(7,793)	198,645	180,535	18,110
14	Liberia Tree And Trading Company, Inc	354,392	199,146	155,246	-	-	-	354,392	199,146	155,246
15	West African Forest Development Incorporated (WAFDI)	-	107,033	(107,033)	-	-	-	-	107,033	(107,033)
16	West Water Group (Liberia), Inc.	518,783	448,764	70,019	-	-	-	518,783	448,764	70,019
Total		121,746,497	88,909,623	32,836,874	(22,266,823)	8,989,678	(31,256,501)	99,479,674	97,899,301	1,580,373

6.1.2. Reconciliation by revenue stream

The table below shows the total initial payments reported by extractive companies and government agencies, after adjustments.

TABLE 117: RECONCILIATION BY REVENUE STREAM

Amounts in US\$

N°	Description of Payment	Templates originally lodged			Adjustments			Final amounts		
		Company (a)	Govt (b)	Difference (c) = (a - b)	Company (d)	Govt (e)	Difference (f) = (c-d)	Company (g) = (a+d)	Govt (h) = (b+e)	Difference (i) = (g-h)
1	WH (Res.) on salaries and wages	31,101,623	29,472,397	1,629,227	(1,370,432)	298,538	(1,668,970)	29,731,191	29,770,935	(39,744)
2	Royalties Gold and other base metals - Other (Agreements) (mineral mining)	12,702,991	-	12,702,991	-	12,702,991	(12,702,991)	12,702,991	12,702,991	-
3	Social contributions (mineral mining)	7,144,054	9,000,000	(1,855,946)	(1,680,000)	(4,000,000)	2,320,000	5,464,054	5,000,000	464,054
4	WH (RES.) on payments for serv. rendered	13,238,991	9,818,880	3,420,112	(2,779,463)	-	(2,779,463)	10,459,528	9,818,880	640,648
5	Other import duties	21,561,415	7,375,247	14,186,168	(14,190,826)	-	(14,190,826)	7,370,589	7,375,247	(4,658)
6	Royalties Gold and other base metals 3% (mineral mining)	19,777,685	19,307,227	470,458	(1,665,296)	-	(1,665,296)	18,112,389	19,307,227	(1,194,838)
7	Other fees/licenses	5,119,958	3,009,169	2,110,790	(78,154)	-	(78,154)	5,041,804	3,009,169	2,032,636
8	ECOWAS trade levy	1,688,266	3,023,395	(1,335,128)	13,784	246	13,538	1,702,050	3,023,641	(1,321,590)
9	Admin. Penalties on WH non-residents	4,000	56,385	(52,385)	(4,000)	(5,062)	1,062	(0)	51,323	(51,323)
10	Presumptive (small tax) (4%)(200c)	1,000	-	1,000	-	-	-	1,000	-	1,000
11	Signature bonuses (mineral mining)	1,000,000	1,003,500	(3,500)	-	-	-	1,000,000	1,003,500	(3,500)
12	CIT Regular (25%)(200b2C)	2,223,363	2,133,689	89,674	(3,233)	-	(3,233)	2,220,131	2,133,689	86,442

N°	Description of Payment	Templates originally lodged			Adjustments			Final amounts		
		Company (a)	Govt (b)	Difference (c) = (a - b)	Company (d)	Govt (e)	Difference (f) = (c-d)	Company (g) = (a+d)	Govt (h) = (b+e)	Difference (i) = (g-h)
13	WH (Res.) Of Income On Rubber Sales 4%	554,350	668,174	(113,824)	-	-	-	554,350	668,174	(113,824)
14	Customs user fees	740,557	600,150	140,407	29,906	662	29,245	770,463	600,812	169,651
15	Surface rental (agriculture)	1,942,889	862,129	1,080,760	(200,000)	-	(200,000)	1,742,889	862,129	880,760
16	Farm use in urban areas	219,515	226,025	(6,510)	-	-	-	219,515	226,025	(6,510)
17	Annual vehicle registration sticker	419,672	235,431	184,240	(51,431)	(7,697)	(43,733)	368,241	227,734	140,507
18	Stumpage fees GoL share (FDA regulation 107-7 section 22b) (Forestry - FMCs)	964,597	775,414	189,183	(287,679)	-	(287,679)	676,918	775,414	(98,496)
19	Log and wood product export fee (FDA regulation 107-7 section 44-45) (Forestry - FMCs)	760,466	733,380	27,086	-	-	-	760,466	733,380	27,086
20	Area fees (forestry - FMCs)	282,987	294,003	(11,015)	-	-	-	282,987	294,003	(11,015)
21	Other fees (Forestry - FMCs)	40,200	45,650	(5,450)	-	-	-	40,200	45,650	(5,450)
22	GST on imported goods (excluding petroleum)	257,918	269,380	(11,462)	-	-	-	257,918	269,380	(11,462)
Total		121,746,497	88,909,623	32,836,874	(22,266,823)	8,989,678	(31,256,501)	99,479,674	97,899,301	1,580,373

6.2. Adjustments

6.2.1. Adjustments to Extractive entities' templates

The adjustments were carried out following confirmations received from extractive entities and government agencies and were supported by adequate evidence wherever deemed appropriate. The adjustments made are as follows:

TABLE 118: ADJUSTMENTS TO EXTRACTIVE ENTITIES' TEMPLATES

Adjustments to extractive company payments	Total amount (in US\$)
Tax amounts incorrectly reported (a)	(14,290,225)
Tax paid reported but outside the period covered (b)	(7,900,690)
Tax paid reported but outside the reconciliation scope (c)	(180,308)
Tax reported but not paid (d)	(6,261)
Tax paid not reported (e)	110,661
Total	(22,266,823)

a) Tax amounts incorrectly reported

These relate mainly to an amount of other import duties incorrectly reported by BEA MOUNTAIN MINING, INC. Adjustments were made based on the LRA's confirmation. Details of the adjustments by payment stream made to company payments are set out in the table below:

TABLE 119: ADJUSTMENTS FOR TAX AMOUNTS INCORRECTLY REPORTED BY PAYMENT STREAM

Revenue stream	Total amount (in US\$)
Other import duties	(14,105,378)
WH (Res.) on payments for serv. Rendered	(1,217,568)
Surface rental (agriculture)	(200,000)
Annual vehicle registration sticker	(56,916)
WH (Res.) on salaries and wages	1,289,636
Total	(14,290,225)

Details of the adjustments by company can be presented as follows:

TABLE 120: ADJUSTMENTS FOR TAX AMOUNTS INCORRECTLY REPORTED BY COMPANY

Company	Total amount (in US\$)
Bea Mountain Mining, Inc	(14,105,378)
Arcelor Mittal (Liberia) Ltd	(127,932)
Firestone Liberia, LLC	(56,916)
Total	(14,290,225)

b) Tax paid reported but outside the period covered

These are payment flows reported by extractive companies, but which are paid outside the reconciliation period, i.e. received before 1 January 2023 or after 31 December 2023. A summary of the adjustments made to company payments is set out in the table below:

TABLE 121: ADJUSTMENTS FOR TAX PAID REPORTED BUT OUTSIDE THE PERIOD COVERED

Company	Total amount (in US\$)
Arcelor Mittal (Liberia) Limited	(3,969,617)
Bea Mountain Mining, Inc	(3,152,629)
Euro-Liberia Logging Company	(347,937)
Golden Veroleum Liberia, Inc	(331,946)
Liberian Agricultural Company	(98,562)
Total	(7,900,690)

c) Tax paid reported but outside the reconciliation scope

These are payments reported by extractive companies but related to payments flows outside the agreed reconciliation scope. These payments are included in the unilateral disclosure from the LRA. Details of the adjustments by company can be presented as follows:

TABLE 122 : ADJUSTMENTS FOR TAX PAID BUT OUTSIDE THE RECONCILIATION SCOPE

Company	Total amount (in US\$)
Firestone Liberia, LLC	(101,071)
Cavalla Rubber Corporation	(63,788)
Liberian Agricultural Company	(9,960)
Kisvan Timber Corporation	(3,233)
Libinc Oil Palm, Inc	(2,256)
Total	(180,308)

d) Tax reported but not paid

These are payments reported by extractive companies but related to payments flows outside the agreed reconciliation scope, and consist mainly of amounts reported as Annual Vehicle Registration Sticker by the company Kisvan Timber Corporation. These payments are included in the unilateral disclosure from the LRA.

e) Tax paid not reported

These are payment flows reported by government agencies but not reported by extractive companies. Adjustments were made based on flag receipts or confirmations made available by the companies. A summary of the adjustments made to company payments is set out in the table below:

TABLE 123: ADJUSTMENTS FOR TAX PAID NOT REPORTED BY COMPANY

Company	Total amount (in US\$)
Euro-Liberia Logging Company	66,624
Firestone Liberia, LLC	28,640
Cavalla Rubber Corporation	11,263
Libinc Oil Palm, Inc	4,135
Total	110,661

Details of the adjustments by payment stream can be presented as follows:

TABLE 124: ADJUSTMENTS FOR TAX PAID NOT REPORTED BY PAYMENT STREAM

Payment stream	Total amount (in US\$)
Stumpage fees GoL share (FDA regulation 107-7 section 22b) (Forestry - FMCs)	60,258
Customs user fees	29,906
ECOWAS trade levy	13,784
Other import duties	6,366
WH (Res.) on salaries and wages	347
Total	110,661

6.2.2. Adjustments to Government Agency templates

The adjustments were carried out based on confirmations received from extractive companies or from the LRA and supported by flag receipts wherever deemed appropriate. The adjustments are detailed as follows:

TABLE 125: ADJUSTMENTS TO GOVERNMENT AGENCIES' TEMPLATES

Adjustments to government payments	Total amount (in US\$)
Tax received not reported (a)	13,004,505
Tax received reported but outside the reconciliation scope (b)	(14,827)
Tax incorrectly classified (c)	(4,000,000)
Total	8,989,678

a) Tax received not reported

These are payment flows reported by the extractive companies, but which were not reported by the LRA. Adjustments to reported payments were therefore made based on confirmations received from the company and the review of the supporting documents (receipts). Details of the adjustments by company can be presented as follows:

TABLE 126: ADJUSTMENTS FOR REVENUES RECEIVED NOT REPORTED BY COMPANY

Company	Total amount (in US\$)
Arcelor Mittal (Liberia) Ltd	12,702,991
Libinc Oil Palm, Inc	298,538
Kisvan Timber Corporation	2,068
Cavalla Rubber Corporation	908
Total	13,004,505

Details of the adjustments by payment stream can be presented as follows:

TABLE 127: ADJUSTMENTS FOR REVENUES RECEIVED NOT REPORTED BY PAYMENT STREAM

Revenue stream	Total amount (in US\$)
Royalties Gold and other base metals (Iron Ore 4.5%)	12,702,991
WH (Res.) on salaries and wages	298,538
Annual Vehicle Registration Sticker	2,068
Customs user fees	662
ECOWAS Trade levy	246
Total	13,004,505

b) Tax received reported but outside the reconciliation scope

These are payment flows reported by the LRA, but related to payments flows outside the agreed reconciliation scope. These payments were therefore removed from the reconciliation basis and included in the unilateral disclosure from the LRA. A summary of the adjustments made to LRA revenues detail by company is set out in the table below:

TABLE 128: ADJUSTMENTS MADE FOR REVENUES OUTSIDE THE PERIOD COVERED BY COMPANY

Company	Total amount (in US\$)
Bea Mountain Mining, Inc	(9,765)
Kisvan Timber Corporation	(3,769)
Euro-Liberia Logging Company	(1,293)
Total	(14,827)

Details of the adjustments by payment stream can be presented as follows:

TABLE 129: ADJUSTMENTS FOR REVENUES OUTSIDE THE PERIOD COVERED BY PAYMENT STREAM

Revenue stream	Total amount (in US\$)
Annual vehicle registration sticker	(9,765)
Admin. Penalties on WIH non-residents	(5,062)
Total	(14,827)

c) Tax incorrectly classified

These are errors made by the LRA when filling out the RTs and related to social contributions reported by Western Cluster Limited for an amount of US\$ 4 million. This amount was reclassified to social expenditure.

6.3. Unreconciled discrepancies

Following the adjustments made, the total unreconciled discrepancies amounted to US\$ 1,580,373 representing 1.61% of total revenues of US\$ 97,899,301 included in the reconciliation scope. This is the sum of positive difference of US\$ 6,714,524 and negative differences amounting to US\$(5,134,151). These unreconciled differences can be analyzed as follows:

TABLE 130: SUMMARY OF UNRECONCILED DISCREPANCIES

Reasons for differences	Total	Negative Differences	Positive differences
	(in US\$)	(in US\$)	(in US\$)
Reporting template not submitted by the extractive company (a)	(686,072)	(686,072)	-
Tax not reported by the Government Agency (b)	6,709,044	-	6,709,044
Tax not reported by the extractive company (c)	(4,438,319)	(4,438,319)	-
Not material difference	(4,279)	(9,760)	5,480
Total	1,580,373	(5,134,151)	6,714,524

a) Reporting template not submitted by the extractive company

These differences relate to taxes reported by government agencies, but which could not be reconciled because the companies failed to submit their reporting templates.

b) Tax not reported by the Government Agency

These differences relate to taxes paid by extractive companies but not reported by the LRA. Due to the lack of feedback from companies and the LRA, these differences remain unreconciled.

This could be the result of extractive companies using accrual basis instead of cash basis and this may explain the unreconciled difference. It was therefore not possible to confirm from the LRA the existence of certain payments declared by the extractive companies.

c) Tax not reported by the extractive company

These differences relate to taxes received by LRA but not reported by extractive companies. Due to the lack of feedback from companies and LRA, these differences remain unreconciled. This could be mainly the result of the company maintaining its accounting records on the accrual basis. It was therefore not possible to confirm from the company the existence of certain payments declared by the LRA.

The breakdown of unreconciled differences by company and payment stream are presented in the tables below:

Unreconciled differences by extractive entity:

A summary of the unreconciled differences by company are set out in the table below:

TABLE 131: SUMMARY OF UNRECONCILED DISCREPANCIES BY COMPANY

Amounts in US\$

No.	Company	Unreconciled difference	Reasons for differences			
			RT not submitted by the extractive company	Tax not reported by the Govt Agency	Tax not reported by the extractive company	Non-material difference < US\$ 2,000
1	Arcelor Mittal (Liberia) Ltd	202,426	-	1,005,326	(803,448)	548
2	Bea Mountain Mining, Inc.	1,406,536	-	4,070,401	(2,663,316)	(549)
3	China-Union Investment (Liberia) Bong Mines Co. Ltd	(145,323)	-	91,341	(235,038)	(1,626)
4	Western Cluster Limited	692,711	-	715,136	(21,465)	(960)
5	Cavalla Rubber Corporation	3,740	-	-	-	3,740
6	Firestone Liberia, LLC	98	-	-	-	98
7	Golden Veroleum Liberia Inc.	(13,442)	-	112,755	(126,197)	-
8	Liberian Agricultural Company	(259,716)	-	62,981	(323,046)	349
9	Libinc Oil Palm, Inc	137,820	-	304,866	(166,196)	(850)
10	Euro-Liberia Logging Company	(1,780)	-	-	-	(1,780)
11	Geblo Logging, Inc	(382,685)	(382,685)	-	-	-
12	Horizon Logging Limited	(196,354)	(196,354)	-	-	-
13	Kisvan Timber Corporation	18,110	-	37,827	(17,679)	(2,038)
14	Liberia Tree And Trading Company, Inc	155,246	-	160,351	(5,850)	745
15	West African Forest Development Incorporated (WAFDI)	(107,033)	(107,033)	-	-	-
16	West Water Group (Liberia), Inc.	70,019	-	148,059	(76,084)	(1,957)
Total Unreconciled Differences		(1,580,373)	(686,072)	6,709,044	(4,438,319)	(4,279)

Unreconciled differences by payment stream:

A summary of unreconciled amounts by type of payment are set out in the table below:

TABLE 132: SUMMARY OF UNRECONCILED DISCREPANCIES BY PAYMENT STREAM

Amounts in US\$

No.	Revenue stream	Unreconciled difference	Reasons for differences			
			RT not submitted by the extractive company	Tax not reported by the Govt Agency	Tax not reported by the extractive company	Non-material difference < US\$ 2,000
1	WH (Res.) on salaries and wages	(39,744)	(72,491)	1,144,853	(1,114,035)	1,929
2	Royalties Gold and other base metals - Other (Agreements) (mineral mining)	-	-	-	-	-
3	Social contributions (mineral mining)	464,054	-	463,014	-	1,040
4	WH (RES.) on payments for serv. rendered	640,648	(12,189)	843,133	(190,295)	-
5	Other import duties	(4,658)	-	-	(4,556)	(102)
6	Royalties Gold and other base metals 3% (mineral mining)	(1,194,838)	(1,800)	229,504	(1,420,720)	(1,823)
7	Other fees/licenses	2,032,636	-	2,034,051	(3,000)	1,584
8	ECOWAS trade levy	(1,321,590)	-	15,744	(1,337,170)	(164)
9	Admin. Penalties on WH non-residents	(51,323)	(47,880)	-	-	(3,443)
10	Presumptive (small tax) (4%)(200c)	1,000	-	-	-	1,000
11	Signature bonuses (mineral mining)	(3,500)	(500)	-	(3,000)	-
12	CIT Regular (25%)(200b2C)	86,442	(187,351)	284,042	(10,250)	-
13	WH (Res.) Of Income On Rubber Sales 4%	(113,824)	-	-	(113,824)	-
14	Customs user fees	169,651	-	289,030	(118,979)	(400)
15	Surface rental (agriculture)	880,760	(3,050)	912,771	(28,400)	(561)

No.	Revenue stream	Unreconciled difference	Reasons for differences			
			RT not submitted by the extractive company	Tax not reported by the Govt Agency	Tax not reported by the extractive company	Non-material difference < US\$ 2,000
16	Farm use in urban areas	(6,510)	(4,740)	-	-	(1,770)
17	Annual vehicle registration sticker	140,507	(663)	146,665	(4,460)	(1,034)
18	Stumpage fees GoL share (FDA regulation 107-7 section 22b) (Forestry - FMCs)	(98,496)	(212,848)	173,178	(58,826)	-
19	Log and wood product export fee (FDA regulation 107-7 section 44-45) (Forestry - FMCs)	27,086	(87,909)	128,074	(13,079)	-
20	Area fees (forestry - FMCs)	(11,015)	(50,000)	38,985	-	-
21	Other fees (Forestry - FMCs)	(5,450)	(4,650)	6,000	(6,700)	(100)
22	GST on imported goods (excluding petroleum)	(11,462)	-	-	(11,027)	(435)
Total payments		(1,580,373)	(686,072)	6,709,044	(4,438,319)	(4,279)

7. ANALYSIS OF REPORTED DATA

7.1. Analysis of total extractive revenues

Total extractive revenues are made up of the reconciled revenues after adjustments, unilateral disclosure of payments by extractive entities and unilateral disclosure of revenues by government agencies as set out below.

7.1.1. Analysis of total revenues - contribution by sector

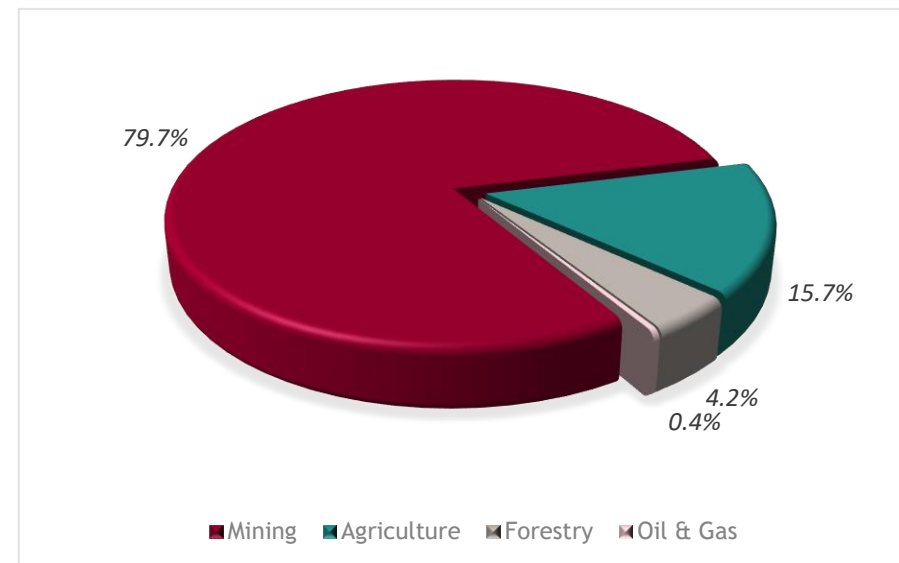
The analysis of Government revenues by sector contribution indicates that the mining sector contributed 80% of the total extractive revenues during FY 2023. The contribution of each sector towards extractive revenues is presented in the table below:

TABLE 133 : ANALYSIS OF TOTAL EXTRACTIVE REVENUES BY SECTOR

Sectors	Extractive revenue (in US\$)	Contribution %
Mining	121,489,013	79.7%
Agriculture	23,973,612	15.7%
Forestry	6,445,077	4.2%
Oil & Gas	550,000	0.4%
Total	152,457,702	100.0%

Source: LEITI Reporting templates

FIGURE 50 : CONTRIBUTION TO EXTRACTIVE REVENUES BY SECTOR



7.1.2. Analysis of total revenues - contribution by extractive entity

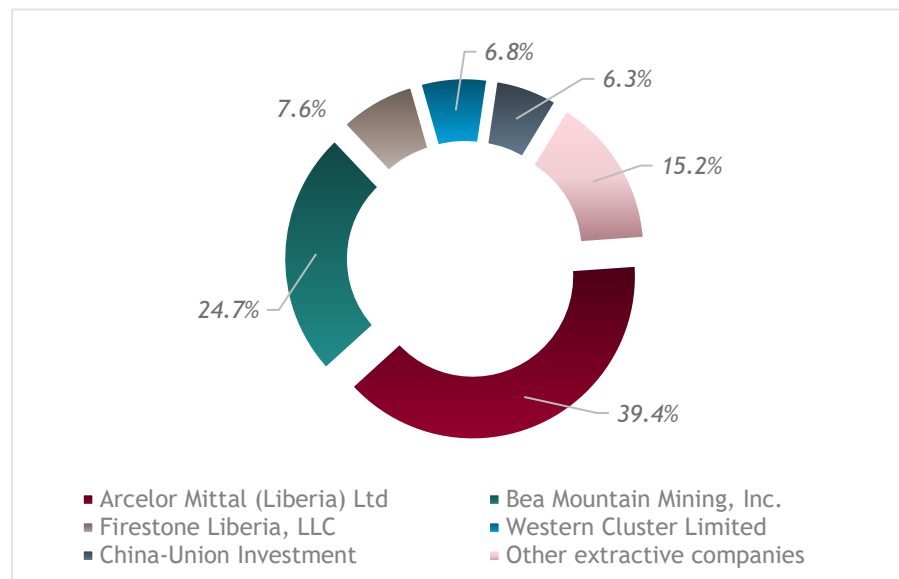
The analysis of Government revenues by company indicates that top five extractive companies contributed approximately 85% of the total extractive revenues during the FY 2023, out of which 39% are generated from Arcelor Mittal (Liberia) Ltd.

TABLE 134 : ANALYSIS OF TOTAL EXTRACTIVE REVENUES BY COMPANY

Extractive company	Sector	Extractive revenues (US\$)	Contribution %
Arcelor Mittal (Liberia) Ltd	Mining	60,022,089	39.4%
Bea Mountain Mining, Inc.	Mining	37,637,109	24.7%
Firestone Liberia, LLC	Agriculture	11,645,450	7.6%
Western Cluster Limited	Mining	10,299,451	6.8%
China-Union Investment (Liberia) Bong Mines Co. Ltd	Mining	9,625,302	6.3%
Other extractive companies		23,228,301	15.2%
Total		152,457,702	100.0%

Source: LEITI Reporting templates

FIGURE 51 : TOP FIVE COMPANIES' CONTRIBUTION



7.1.3. Analysis of total revenues - contribution by revenue stream

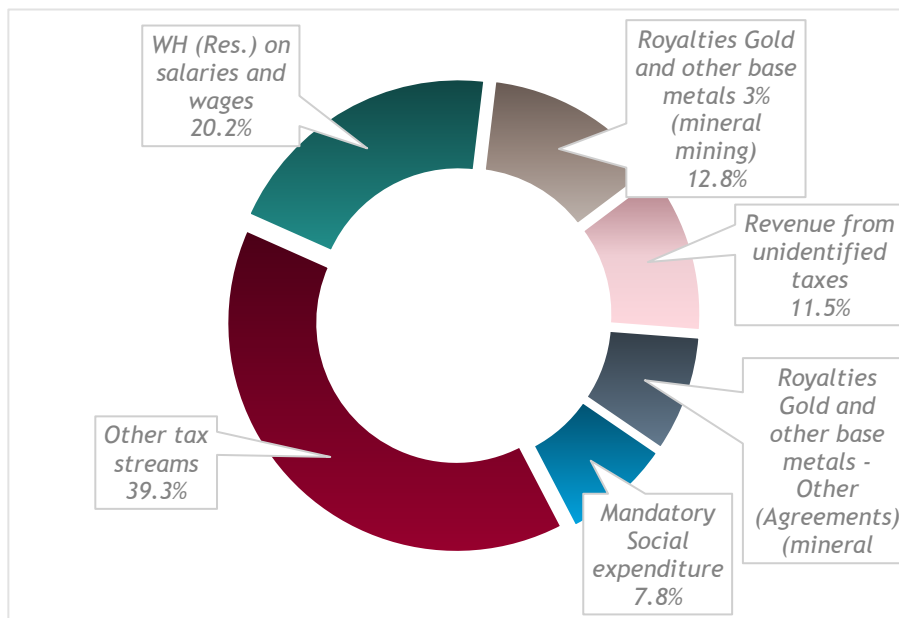
The analysis of payment flows by contribution shows that the top five payment streams represent 61% of the total extractive revenues during FY 2023. Other flows accounted for 39% as set out below.

TABLE 135: ANALYSIS OF TOTAL EXTRACTIVE REVENUES BY PAYMENT STREAM

Payment stream	Extractive revenue (US\$)	% of total payment
WH (Res.) on salaries and wages	30,846,538	20.2%
Royalties Gold and other base metals 3% (mineral mining)	19,565,776	12.8%
Revenue from unidentified taxes	17,500,000	11.5%
Royalties Gold and other base metals - Other (Agreements) (mineral mining)	12,703,116	8.3%
Mandatory Social expenditure	11,908,679	7.8%
Other tax streams	59,933,594	39.3%
Total	152,457,702	100%

Source: LEITI Reporting templates

FIGURE 52 : TOP FIVE PAYMENTS STREAMS CONTRIBUTION



7.1.4. Analysis of total revenues - contribution by Government agency

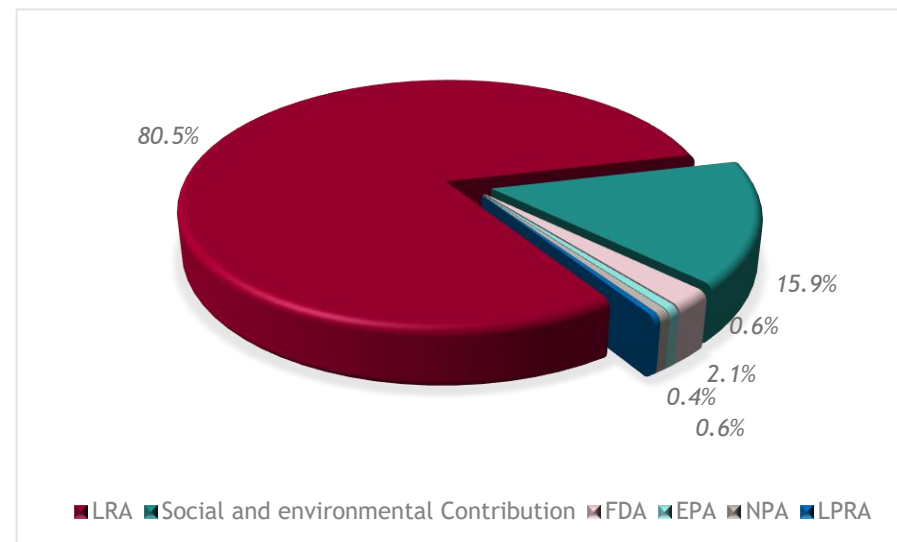
During FY 2023, the LRA collected the largest amount of extractive revenues representing 81% as set out in the table below:

TABLE 136: ANALYSIS OF TOTAL EXTRACTIVE REVENUES BY GOVERNMENT AGENCY

Government Agency	Extractive revenue (US\$)	% of total payment
Liberia Revenue Authority (LRA)	122,652,705	80.5%
Social and environmental Contribution	24,213,324	15.9%
Forestry Development Authority (FDA)	3,228,056	2.1%
Environmental Protection Agency (EPA)	910,449	0.6%
National Port Authority (NPA)	903,169	0.6%
Liberia Petroleum Regulatory Authority (LPRA)	550,000	0.4%
Total	152,457,702	100.00%

Source: LEITI Reporting templates

FIGURE 53 : GOVERNMENT AGENCIES' CONTRIBUTION



7.1.5. Analysis of total revenues - contribution by project

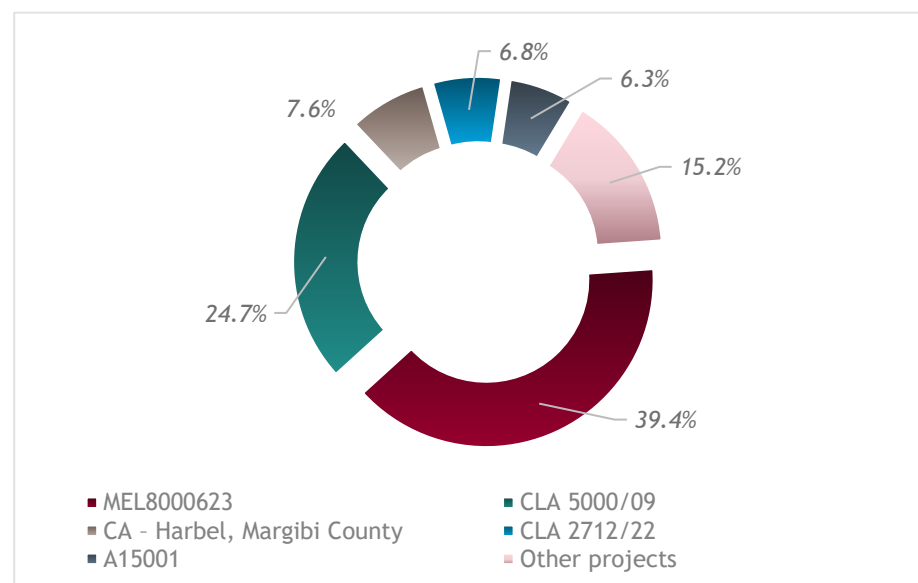
The analysis of Government revenues by project indicates that top five projects contributed approximately 85% of the total extractive revenues during the FY 2023, out of which 39% are generated from the Arcelor Mittal (Liberia) Ltd's project MEL8000623.

TABLE 137 : ANALYSIS OF TOTAL EXTRACTIVE REVENUES BY PROJECT

Project	Company	Extractive revenues (US\$)	Contribution %
MEL8000623	Arcelor Mittal (Liberia) Ltd	60,022,089	39.4%
CLA 5000/09	Bea Mountain Mining, Inc.	37,637,109	24.7%
CA - Harbel, Margibi County	Firestone Liberia, LLC	11,645,450	7.6%
CLA 2712/22	Western Cluster Limited	10,299,451	6.8%
A15001	China-Union Investment (Liberia) Bong Mines Co. Ltd	9,625,302	6.3%
Other projects		23,228,301	15.2%
Total		152,457,702	100.0%

Source: LEITI Reporting templates

FIGURE 54 : TOP FIVE PROJECTS' CONTRIBUTION



7.2. Revenues from unidentified taxes

As part of the revenues disclosed by extractive companies during the reconciliation exercise, the mining company “**Arcelor Mittal (Liberia) Holding Limited**” disclosed other payments for a total amount of US\$ 17.5 million. The details of these payments are presented in the table below :

TABLE 138: REVENUE FROM UNIDENTIFIED TAXES DISCLOSED

Company	Category	Receipt No.	Payment date	Amount US\$
Arcelor Mittal (Liberia) Holding Limited	Revenue from unidentified tax	1293174/130220	29/09/2023	17,000,000
Arcelor Mittal (Liberia) Holding Limited	Revenue from unidentified tax	1292091/129137	21/09/2023	500,000
Total				17,500,000

Source: LEITI reporting templates

The company submitted payment receipts totaling USD 17.5 million deposited into the Consolidated Account under the category “Revenues from unidentified taxes.” According to confirmation from the Liberia Revenue Authority (LRA), this payment is not linked to any specific tax type and, therefore, could not be classified under an established tax category. The LRA indicated that the transaction may relate to a settlement; however, no particulars were provided in the supporting documentation. The company also did not furnish additional details.

Consequently, the amount of USD 17.5 million has been reported under extractive sector revenues as “Revenue from unidentified taxes.”

Similarly, it should be noted that “**ArcelorMittal (Liberia) Holding Limited**” reported additional payments categorized as “other contributions” amounting to USD 599,376. Despite repeated follow-up with the company, no further clarification was provided regarding these amounts, including the specific revenue stream, the nature of the payments, or the government entity that received them. Moreover, these payments were not reported by any government agency as part of extractive sector revenues for FY2023. In the absence of corroborating information, it was not possible to determine whether the payments originated from extractive sector activities or to establish their purpose and classification. As such, they have not been reflected in the government’s extractive sector revenue reporting for FY2023.

7.3. Unilateral disclosure of revenue streams

In accordance with EITI Requirement 4.1.d, government agencies are required to provide aggregate information about the amount of total revenues received from each of the benefit streams agreed in the scope of the EITI report, including revenues that fall below the agreed materiality threshold.

Government agencies have been requested to unilaterally disclose aggregated revenue streams collected from extractive entities that have not been included within the reconciliation scope. Extractive companies have unilaterally disclosed social and environmental contributions paid to third parties in accordance with EITI Requirement 6.1.a. These unilateral disclosures are summarized in the table below.

7.3.1. Unilateral disclosure by Government Agencies

The unilaterally disclosure payments disclosed by government agencies are summarized by sector as follows:

TABLE 139 : SUMMARY OF UNILATERAL DISCLOSURES BY GOVERNMENT AGENCIES

Government agency	Sectors				Total (US\$)
	Mining	Agriculture	Forestry	Oil & Gas	
Liberia Revenue Authority (LRA)	5,626,544	1,186,999	439,861	-	7,253,404
Forestry Development Authority (FDA)	-	-	3,228,056	-	3,228,056
Environmental Protection Agency (EPA)	822,267	16,050	72,132	-	910,449
National Port Authority (NPA)	285,424	502,663	115,082	-	903,169
Liberia Petroleum Regulatory Authority (LPRA)	-	-	-	550,000	550,000
Total Unilateral disclosure	6,734,235	1,705,712	3,855,131	550,000	12,845,078

Source: LEITI Reporting Templates

The details of unilateral disclosures made by government agencies, by extractive companies and by payment stream are presented in Annex 7 to this report.

7.3.2. Social and environmental expenditure disclosed by extractive company

Social payments consist of all contributions made by extractive companies to promote local development and to finance social projects in line with EITI Requirement 6.1. This Requirement encourages MSGs to apply a high standard of transparency to social payments and transfers and to the parties involved in the transactions and the materiality of these payments and transfers to other benefit streams. These payments may be reported even though it is not possible to reconcile them.

Extractive companies included in the reconciliation scope reported unilaterally the following social and environmental expenditure:

TABLE 140 : SUMMARY OF SOCIAL AND ENVIRONMENTAL EXPENDITURE REPORTED BY COMPANIES

Extractive company	Social expenditure		Environmental expenditure	Total (US\$)
	Mandatory	Voluntary		
Firestone Liberia	4,379,896	1,380,556	101,765	5,862,217
Liberian Agricultural Company	-	4,933,749	33,600	4,967,349
Western Cluster Limited	1,000,000	3,000,000	20,650	4,020,650
China Union Investment	4,000,000	-	-	4,000,000
Bea Mountain Mining Corp	615,000	1,266,097	691,118	2,572,215
Arcelor Mittal	1,474,143	207,813	132,360	1,814,316
Golden Veroleum Liberia	241,554	246,194	66,483	554,231

Extractive company	Social expenditure		Environmental expenditure	Total (US\$)
	Mandatory	Voluntary		
Liberia Tree and Trading Company, Inc	126,424	7,600	25,130	159,154
Libinc Oil Palm Inc	-	141,691	-	141,691
Kisvan Timber Corporation	64,000	-	-	64,000
Cavalla Rubber Corporation	7,662	41,650	8,190	57,502
Total	11,908,679	11,225,349	1,079,296	24,213,324

Source: LEITI Reporting Templates

The detail of social and environmental expenditure unilaterally disclosed by extractive companies are presented in Annex 6 to this report.

7.4. Other data disclosed by extractive companies

7.4.1. Production data

The full production data provided by MME and FDA for mining and forestry sector respectively are presented in section 4.14 of this report. In this section are presented the production data disclosed by in-scope extractive companies in the mining and forestry sector and that are detailed in the table below:

TABLE 141: PRODUCTION DATA DISCLOSED BY IN-SCOPE EXTRACTIVE COMPANIES

Company	Sector	Commodity	Unit	Volume	Value (in US\$)
Bea Mountain Mining Corp	Mining	Gold	Kg	12,545	691,254,539
Arcelor Mittal	Mining	Iron Ore	DMT	3,544,081	271,053,171
Western cluster	Mining	Iron Ore	DMT	2,263,656	93,483,294
Euro Liberia Logging Company	Forestry	Round logs	m ³	38,152	6,220,870
LTTC	Forestry	Round logs	m ³	16,408	295,344
Total					1,062,307,217

Source: In-scope extractive companies' reporting templates

The differences noted in volumes reported by extractive companies from one side, and both the MME and FDA from the other are summarized in the table below:

TABLE 142: DIFFERENCES BETWEEN THE EXTRACTIVE COMPANIES AND GOVERNMENT AGENCIES' PRODUCTION DATA

Company	Sector	Commodity	Unit	Extractive company	Government agency	Difference
Bea Mountain Mining Corp	Mining	Gold	Kg	12,545	12,146	399
Arcelor Mittal	Mining	Iron Ore	DMT	3,544,081	3,589,053	(44,972)
Western cluster	Mining	Iron Ore	DMT	2,263,656	413,421	1,850,235
Euro Liberia Logging Company	Forestry	Round logs	m ³	39,239	190	39,049

Company	Sector	Commodity	Unit	Extractive company	Government agency	Difference
Kisvan Timber Corporation	Forestry	Round logs	m ³	-	42	(42)
Liberia Tree and Trading Company	Forestry	Round logs	m ³	16,408	-	16,408

It is to be noted that the MoL did not provide production data for the agriculture sector. Therefore, the production data disclosed by in-scope extractive companies were presented in section 4.14 of this report.

7.4.2. Exports data

The full exports data provided by MME and FDA for mining and forestry sector respectively are presented in section 4.14 of this report. In this section we present the exports data disclosed by in-scope extractive companies in the mining and forestry sector:

TABLE 143: EXPORTS DATA DISCLOSED BY IN-SCOPE EXTRACTIVE COMPANIES

Company	Sector	Commodity	Unit	Volume	Value (in US\$)
Bea Mountain Mining Corp	Mining	Gold	Kg	12,545	691,254,539
Arcelor Mittal	Mining	Iron Ore	DMT	3,544,081	271,053,171
Western cluster	Mining	Iron Ore	DMT	2,263,656	93,483,294
Euro Liberia Logging Company	Forestry	Round logs	m ³	38,152	6,220,870
Liberia Tree and Trading Company	Forestry	Round logs	m ³	16,408	295,344
Total					1,062,307,217

Source: In-scope extractive companies' reporting templates

The differences noted in volumes reported by extractive companies from one side, and both the MME and FDA from the other are summarized in the table below:

TABLE 144: DIFFERENCES BETWEEN THE EXTRACTIVE COMPANIES AND GOVERNMENT AGENCIES' EXPORTS DATA

Company	Commodity	Extractive company		Government agency		Difference	
		Volume	Value (US\$)	Volume	Value (US\$)	Volume	Value (US\$)
Bea Mountain Mining Corp	Gold	12,545	691,254,539	12,146	653,597,918	399	37,656,621
Arcelor Mittal	Iron Ore	3,544,081	271,053,171	3,589,053	432,839,809	(44,972)	(161,786,638)
Western cluster	Iron Ore	2,263,656	93,483,294	413,421	49,858,573	1,850,235	43,624,721
Euro Liberia Logging Company	Round logs	38,152	6,220,870	39,679	1,308,897	(1,527)	4,911,973
Kisvan Timber Corporation	Round logs	-	-	4,065	195,465	(4,065)	(195,465)
Liberia Tree and trading Company	Round logs	16,408	3,219,107	-	-	16,408	3,219,107
West Water Group	Round logs	-	-	10,001	362,622	(10,001)	(362,622)
WAFDI	Round logs	-	-	1,952	67,531	(1,952)	(67,531)

Company	Commodity	Extractive company		Government agency		Difference	
		Volume	Value (US\$)	Volume	Value (US\$)	Volume	Value (US\$)
Geblo Logging Inc	Round logs	-	-	17,277	592,632	(17,277)	(592,632)
Horizon Logging Limited	Round logs	-	-	2,450	102,613	(2,450)	(102,613)
Total			3,219,107		1,125,398		2,093,709

It is to be noted that the MoL did not provide production data for the agriculture sector. Therefore, the production data disclosed by in-scope extractive companies were presented in section 4.14 of this report.

7.4.3. Employment data

According to the EITI reporting templates, the in-scope extractive companies provided livelihood to 19,345 employees as presented in the table below:

TABLE 145: EMPLOYMENT DATA ACCORDING TO THE IN-SCOPE EXTRACTIVE COMPANIES

Company	Domestic employees				Foreign employees				Total
	Permanent		Non-permanent		Permanent		Non-permanent		
	Male	Female	Male	Female	Male	Female	Male	Female	
Arcelor Mittal (Liberia) Ltd.	1,440	170	459	79	2	-	129	2	2,281
Bea Mountain Mining Inc.	2,878	-	-	-	1,110	2	-	-	3,990
China-Union Investment (Liberia) Bong Mines Co. Ltd	78	-	-	-	-	-	-	-	78
Western Cluster Limited	-	-	426	41	-	-	14	-	481
Euro Liberia Logging Company	33	-	46	7	7	-	-	-	93
Kisvan Timber Corporation	32	3	-	-	3	-	-	-	38
Liberia Tree And Trading Company Inc.	6	1	11	2	-	-	-	-	20
Cavalla Rubber Corporation	616	85	180	1	-	-	1	-	883
Maryland Oil Palm Plantation	560	294	275	2	5	-	2	-	1,138
Firestone Liberia, LLC	3,344	503	196	29	4	-	15	1	4,092
Golden Veroleum (Liberia) Inc.	2,338	1,103	-	-	59	-	-	-	3,500
Liberian Agricultural Company	1,741	282	-	-	11	1	-	-	2,035
Libinc Oil Palm, Inc	219	129	353	6	-	-	9	-	716
Total	13,285	2,570	1,946	167	1,201	3	170	3	19,345

Nevertheless, the MoL reported 12,333 employees in the extractive sectors combined, resulting thus in a difference of 7,012 employees.

8. RECOMMENDATIONS

The EITI Standard requires taking steps to act upon lessons learnt with a view to strengthening the impact of EITI implementation on natural resource governance, and to consider the recommendations resulting from EITI implementation.

The following recommendations have been made to improve the impact of EITI implementation on natural resource governance in Liberia.

8.1. Data quality and assurance (EITI Requirements 4.1 and 4.9)

EITI Requirement 4.9 requires an assessment of whether the payments and revenues are subject to credible, independent audit, following international auditing standards. EITI Requirement 4.1.e warrants companies to publicly disclose their audited financial statements, or the main items where financial statements are not available.

As part of the procedures to ensure the reliability of the data reported to the Independent Administrator during the reconciliation process, reporting entities were requested to provide signed copies of their reporting templates and a copy of their audited financial statements for the reporting period. Companies were also requested to provide confirmation from an external auditor that the figures reported in the Reporting Templates are complete and in agreement with the audited accounts.

Most reporting entities did not fully comply with this assurance process agreed by the LEITI MSG as detailed in Section 2.5 of this report.

Additionally, the reporting templates that were submitted by the LRA were not signed nor certified by the GAC, as agreed by the LEITI MSG.

The LEITI MSG should engage with reporting entities and emphasize the importance of complying with this requirement to provide signed, duly certified and audited templates for future reports, to meet EITI Requirement 4.9.

It is also recommended to put in place an assurance process for the government reporting templates to allow their reconciliation with the audited accounts.

8.2. Disaggregation and classification of the extractive sector revenues (EITI Requirement 4.1)

In accordance with EITI Requirement 4.1 (Comprehensive disclosure of taxes and revenues), implementing countries are expected to ensure that all material payments and revenues from extractive activities are comprehensively disclosed and classified according to revenue streams.

As part of the revenues disclosed by extractive companies during the reconciliation exercise, the mining company “**Arcelor Mittal (Liberia) Holding Limited**” disclosed other payments for a total amount of US\$ 17.5 million. The details of these payments are presented in the table below :

TABLE 146: REVENUE FROM UNIDENTIFIED TAXES DISCLOSED

Company	Category	Receipt No.	Payment date	Amount US\$
Arcelor Mittal (Liberia) Holding Limited	Revenue from unidentified tax	1293174/130220	29/09/2023	17,000,000
Arcelor Mittal (Liberia) Holding Limited	Revenue from unidentified tax	1292091/129137	21/09/2023	500,000
Total				17,500,000

Source: LEITI reporting templates

The company provided payment receipts for US\$ 17.5 million into the Consolidated Account under the category “Revenue from unidentified taxes.” The Liberia Revenue Authority (LRA) confirmed that these payments could not be linked to any specific tax type and may relate to settlements or adjustments; however, the exact particulars were not specified in the receipts, and no further details were provided by the company. The lack of clear classification limits the transparency and usefulness of the data for oversight and public accountability.

To comply with EITI Requirement 4.1 and 4.7.a, it is recommended that the LRA and extractive companies :

- *Disaggregate all payments by revenue stream: All payments should be clearly classified under the corresponding tax or revenue category, including royalties, corporate income tax, license fees, and other applicable fees.*
- *Provide detailed reporting for bulk or consolidated payments: Where payments are made as a lump sum covering multiple revenue streams or projects, detailed records should be maintained, including the amount paid by date, by revenue stream, and by project.*
- *Clarify settlement-related payments: The LRA should work with extractive companies to identify the nature of payments that cannot be immediately classified, including any settlements, penalties, or adjustments, and ensure these are accurately disclosed in the reporting templates.*
- *Strengthen internal reporting and verification: Both the LRA and extractive companies should adopt internal procedures to reconcile payments with specific revenue categories prior to submission to LEITI, thereby reducing the occurrence of “unidentified taxes” in the reconciliation process.*

8.3. Public disclosure of the full text of the mining licenses (EITI Requirement 2.4.e)

EITI Requirement 2.4.e expects implementing countries to disclose the full text of any license, lease, title or permit by which a government confers on a company or individual rights to exploit oil, gas and/or mineral resources.

The online cadastral system provides information on license holders, co-ordinates of the licensed areas, date of application award and duration of the license as well as the

commodity being produced. Details on the mining licenses, including the full text, are not publicly available, however.

Although the full text of active Mineral Development Agreements (MDAs) and class A mining licenses, as well as forestry and agriculture concessions, is publicly available on the LEITI website and LEITI Warehouse Database, only 57 out of 77 class B mining licenses were published on the LEITI website. In 2022, the LEITI MSG issued a decision mandating that forestry, oil and gas, and agricultural concessions, in addition to MDAs and Class A and B mining licenses, be published on the LEITI website. Despite this decision, the full text of mining licenses has not yet been made publicly accessible.

The details of the disclosed class B mining licenses are presented in the Annex 3 of this report.

It is therefore recommended that the full text of all mining licenses (Class A, B, and C) be published online via the MME, the LEITI website, or the LEITI Warehouse Database. This will enhance transparency, strengthen public accountability, and ensure compliance with EITI requirements.

8.4. Improving the accuracy of production and exports data (EITI Requirements 3.2 and 3.3)

According to EITI Requirements 3.2 and 3.3, implementing countries must disclose production and export data for the period covered by the EITI Report, including total production and export volumes and the value of production and export by commodity, by project, and, where relevant, by state/region, in addition to the sources of and the methods for calculating production and exports volumes and values.

The following observations were noted during the data collection phase:

- The MoA did not maintain comprehensive data with regard to production and exports in the extractive sector for period under review.
- Forestry production was provided in volume only. Production value was not provided.
- Similarly, we noted differences between the production and exports data reported by extractive companies and those reported by the MME and FDA in the mining and forestry sectors respectively and that are detailed in sections 7.3.1 and 7.3.2 of the EITI report.

To comply with EITI Requirements 3.2 and 3.3, government agencies should:

- *maintain data on production and exports. The data should include volumes and values and the methods for calculating figures;*
- *improve transparency in this area by publishing production and exports data regularly on a timely basis on their website. For example, the MME could publish up to date data on the Online Repository for the mining sector; and*
- *carry out periodic reconciliations of the production and export values and volumes disclosed by companies and other sources. These reconciliations should be done at*

least quarterly, and any significant discrepancies should be fully investigated and reported to the relevant agencies.

8.5. Strengthening Beneficial Ownership disclosure (EITI Requirement 2.5)

EITI Requirement 2.5 stipulates that: “As of 1 January 2020, it is required that implementing countries request, and companies publicly disclose, Beneficial Ownership information. This applies to corporate entities that apply for or hold a participating interest in an exploration or production oil, gas or mining license or contract and should include the identities of their beneficial owners, the level of ownership and details about how ownership or control is exerted.”

While Liberia has made significant progress through the operational BO Register and the 2023 BO Regulations, achieving full transparency and reliability of BO data requires continued efforts. Key recommendations include:

- *Strengthen assurance and verification: implement robust due diligence and independent verification procedures to ensure the accuracy of BO data submitted by reporting entities.*
- *Ensure comprehensive coverage: require all extractive companies to submit and regularly update their BO information online, with integration into LEITI’s reporting process.*
- *Enforce compliance consistently: apply sanctions for non-submission, late submission, or false declarations to ensure adherence to BO regulations.*
- *Enhance technical capacity and awareness: Provide targeted training and guidance to smaller operators, civil society, and other stakeholders to facilitate correct submission and effective use of BO information.*

8.6. Public disclosure and Transparency of the SOEs (EITI Requirement 2.6)

According to EITI Requirement 2.6, State-Owned Enterprises (SOEs) are required to publicly disclose their audited financial statements, as well as provide comprehensive information on their ownership stakes, dividends, and quasi-fiscal expenditures. Full disclosure ensures transparency in state participation in the extractive sector and enables effective oversight of the revenues and assets managed by SOEs.

The last publicly available audited financial statements of NOCAL cover the fiscal year 2019/20 and were previously published on the GAC website. However, the audited financial statements for FY 2023 are not publicly available and were not provided by NOCAL during the reporting process.

Although the NOCAL website includes a dedicated section for audited financial statements, the links provided are non-functional. In addition, no information was provided regarding NOCAL’s participation in extractive companies, the related dividends paid or due to the Government of Liberia, or any quasi-fiscal expenditures undertaken.

To improve transparency on the state participation and/or carried interest in the extractive sector, all SOEs financial statements should be published and included on their respective websites in accordance with EITI requirement 2.6. Similarly, the SOEs shall report all participation shares and carried interests in extractive companies, as well as quasi-fiscal expenditures incurred.

8.7. Mainstreaming and systematic disclosure of EITI data (EITI Requirement 7.2)

In line with EITI Requirement 7.2, the Multi-Stakeholder Group (MSG) is encouraged to ensure that all EITI data is published in machine-readable and interoperable formats. Data should be coded or tagged so that it can be easily compared with other publicly available information.

The EITI data in this report comes from several sources, including government agencies involved in the LEITI reporting process. While some contextual information on the extractive sector, such as revenues collected, production, exports, and budget allocations, was previously not available in a centralised system, the launch of the [LEITI Data Warehouse portal](#) has significantly improved access. The portal now provides information on the sector overview, revenues, production, exports, and employment, active licenses with coordinates and licensee details, texts of contracts, and other relevant sector data in a structured format.

Despite this progress, the data currently published is mainly limited to the latest information from recent EITI reports. Historical datasets with fully tagged data, and machine-readable formats are not yet available for all disclosures.

It is therefore recommended that the LEITI MSG and relevant Government Agencies:

- *Expand the LEITI Data Warehouse to include historical data and ensure all disclosures are in machine-readable and interoperable formats.*
- *Upgrade and integrate government systems, for example the Liberia Revenue Authority, the Ministry of Mines and Energy, the Ministry of Agriculture, and the Forestry Development Authority, to provide complete, centralised data on licenses, revenues, production, exports, and beneficial ownership.*
- *Develop clear open data policies covering access, release, and re-use of EITI data under an open license.*
- *Publish clear links and metadata on the LEITI website so that all EITI data is easy to find and download.*

8.8. Updating data on the contribution of the informal mining sector (EITI Requirement 6.3.a)

EITI Requirement 6.3.a requires implementing countries to disclose information about the contribution of informal sector activities, including but not necessarily limited to Artisanal and Small-Scale Mining (ASM).

ASM's contribution to employment in the sector proved to be significant with an estimated number of workers at over 100,000 direct jobs and 1.6 million indirect jobs according to a study conducted in 2011. The ASM contribution to employment was not included in the extractive sector's employment data for FY2023 because of a lack of updated estimates available.

We recommend that further studies be conducted to document the contribution of the informal mining sector to the country's economy. This would support the MME to better control the mining sector.

ANNEXES

Annex 1: List of mineral rights that were awarded in FY2023

Please refer to the separate Annex to this report.

Annex 2: List of active licenses in the mining sector

Please refer to the separate Annex to this report.

Annex 3: Class B mining licenses disclosed

Please refer to the separate Annex to this report.

Annex 4: Legal ownership reported

No	Company	Sector	Name of the shareholder	% Interest	Nationality of the shareholder	Stock exchange Listed entity (yes/no)	Stock exchange (if the company's shares are quoted)
1	Arcelor Mittal (Liberia) Ltd	Mining	ArcelorMittal Holding AG	85%	Luxembourg	No	N/A
			Government of Liberia	15%	Liberia	No	N/A
2	Bea Mountain Mining, Inc.	Mining	Mano Gold Liberia Ltd	100%	Virgin Islands	No	N/A
3	China-Union Investment (Liberia) Bong Mines Co. Ltd	Mining	NC	NC	NC	NC	NC
4	Western Cluster Limited	Mining	Bloom Fountain Limited	100%	Mauritius	No	N/A
5	Cavalla Rubber Corporation	Agriculture	Société Internationale de Plantations d'Hévéas (SIPH)	100%	French	Yes	Paris
6	Firestone Liberia, LLC	Agriculture	Firestone Natural Rubber - FSNR	100%	American	No	N/A
7	Golden Veroleum Liberia Inc.	Agriculture	Golden Veroleum LH	100%	Virgin Islands	NC	NC
8	Liberian Agricultural Company	Agriculture	SOCFINAF	100%	Luxembourg	Yes	Luxembourg
9	Libinc Oil Palm, Inc	Agriculture	NC	NC	NC	NC	NC
10	Euro-Liberia Logging Company	Forestry	Guido Monarco	10%	Italian	No	N/A
			CIDI Capital	10%	Italian	No	N/A
			Sadamelik Corporation	80%	Italian	No	N/A
11	Geblo Logging, Inc	Forestry	NC	NC	NC	NC	NC
12	Horizon Logging Limited	Forestry	NC	NC	NC	NC	NC

No	Company	Sector	Name of the shareholder	% Interest	Nationality of the shareholder	Stock exchange Listed entity (yes/no)	Stock exchange (if the company's shares are quoted)
13	Kisvan Timber Corporation	Forestry	NC	NC	NC	NC	NC
			Nyunyun Johnson Toweh	65%	Liberian	No	N/A
14	Liberia Tree And Trading Company, Inc	Forestry	Nunah T. Gblozuo	15%	Liberian	No	N/A
			Outstanding	20%	NC	No	N/A
15	West African Forest Development Incorporated (WAFDI)	Forestry	NC	NC	NC	NC	NC
16	West Water Group (Liberia), Inc.	Forestry	NC	NC	NC	NC	NC

Source: LEITI Reporting templates

NC: Not Communicated

N/A: Not applicable

Annex 5: Beneficial ownership reported

No	Company	Full name as it appears on national identity card	Politically exposed person (PEP)	Applicable from	Applicable to	Date of Birth	National identity number (National Registration Numbers (NRC))	Nationality	Country of residence	By direct shares	By direct voting rights	Date when beneficial interest was acquired	Nb. Of shares	Nb. Of votes	% of shares
1	Arcelor Mittal (Liberia) Ltd	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
2	Bea Mountain Mining, Inc.	Murathan Doruk Günal	NC	N/A	N/A	NC	NC	Turkish	Türkiye	NC	NC	NC	NC	NC	NC
		Metehan Günal	NC	N/A	N/A	NC	NC	Turkish	Türkiye	NC	NC	NC	NC	NC	NC
		Serhan Umurhan	NC	N/A	N/A	NC	NC	Turkish	Türkiye	NC	NC	NC	NC	NC	NC
		Alpay Dogutepe	NC	N/A	N/A	NC	NC	Turkish	Türkiye	NC	NC	NC	NC	NC	NC
		Ayhan Yilmaz	NC	N/A	N/A	NC	NC	Turkish	Türkiye	NC	NC	NC	NC	NC	NC
		Debar Allen	NC	N/A	N/A	NC	NC	Liberian	Liberia	NC	NC	NC	NC	NC	NC
3	China-Union Investment (Liberia) Bong Mines Co. Ltd	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
4	Western Cluster Limited	Mr.AnilAgarwal	No	N/A	N/A	01 September 1952	NC	Indian	UK	Yes	Yes	2011	NC	NC	NC
5	Cavalla Rubber Corporation	Marc Gernard Louis Damien Genot	NC	N/A	N/A	18 March 1956	NC	French	Liberia	Yes	Yes	01 April 1989	NC	NC	NC
6	Firestone Liberia, LLC	Rick Irwin Burnett	NC	N/A	N/A	31 December 1970	NC	American	United States	Yes	Yes	07 August 2020	NC	NC	NC
7	Golden Veroleum Liberia Inc.	Mutual funds (pool investors)	N/A	N/A	N/A	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC

No	Company	Full name as it appears on national identity card	Politically exposed person (PEP)	Applicable from	Applicable to	Date of Birth	National identity number (National Registration Numbers (NRC)	Nationality	Country of residence	By direct shares	By direct voting rights	Date when beneficial interest was acquired	Nb. Of shares	Nb. Of votes	% of shares
8	Liberian Agricultural Company	Hubert Marie Ghislain Eric Bernard Nicolas Fabri	NC	N/A	N/A	January 1952	NC	Belgian	Switzerland	Yes	Yes	2008	NC	NC	NC
		Vincent Marie Claude Henri Bollore	NC	N/A	N/A	April 1952	NC	French	France	Yes	Yes	2008	NC	NC	NC
9	Libinc Oil Palm, Inc	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
10	Euro-Liberia Logging Company	Guido Monarco	NC	N/A	N/A	01 December 1955		Italian	NC	NC	NC	NC	NC	NC	NC
11	Geblo Logging, Inc	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
12	Horizon Logging Limited	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
13	Kisvan Timber Corporation	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
14	Liberia Tree And Trading Company, Inc	Nyunnyun J Toweh	NC	N/A	N/A	06 September 1974	NC	Liberian	Liberia	Yes	Yes	28 February 2014	NC	NC	NC
		Nunah T. Gblozuo	NC	N/A	N/A	15 September 2004	NC	Liberian	Liberia	Yes	Yes	28 February 2014	NC	NC	NC
15	West African Forest Development Incorporated (WAFDI)	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
16	West Water Group (Liberia), Inc.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC

Source: LEITI Reporting templates

NC: Not Communicated

N/A: Not applicable

Annex 6: Social and environmental expenditure disclosed by extractive companies

Please refer to the separate Annex to this report.

Annex 7: Unilateral disclosure by government agencies

Please refer to the separate Annex to this report.

Annex 8: Reconciliation sheets

Please refer to the separate Annex to this report.

Annex 9: Data submission and reliability

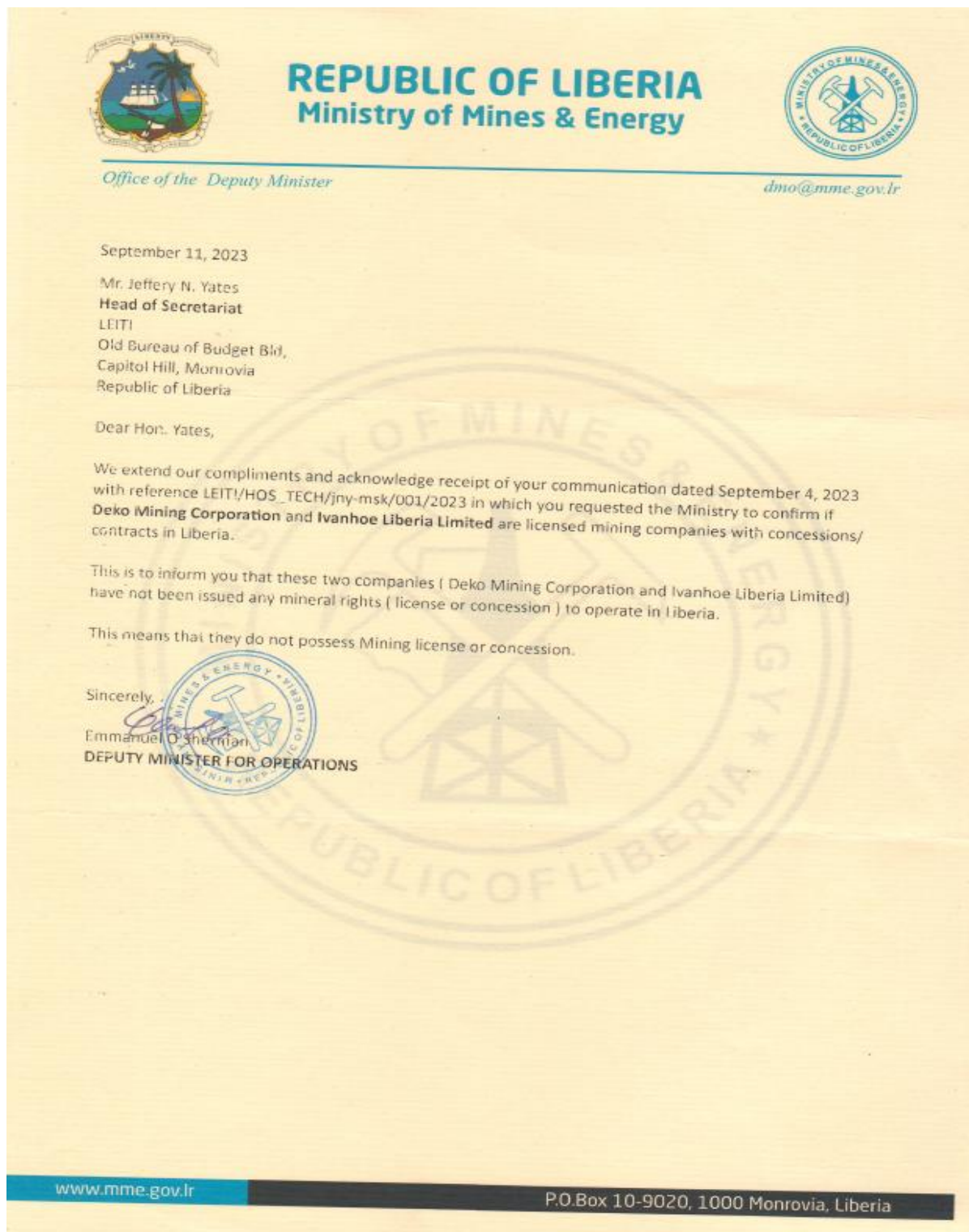
Extractive companies

N°	Company	Excel RT	Signed RT	Certified RT	Audited FS
1	Arcelor Mittal (Liberia) Ltd	Yes	Yes	No	Yes
2	Bea Mountain Mining, Inc.	Yes	No	Yes	Yes
3	China-Union Investment (Liberia) Bong Mines Co. Ltd	Yes	No	No	No
4	Western Cluster Limited	Yes	No	Yes	Yes
5	Cavalla Rubber Corporation	Yes	Yes	Yes	Yes
6	Firestone Liberia, LLC	Yes	Yes	Yes	Yes
7	Golden Veroleum Liberia Inc.	Yes	Yes	No	No
8	Liberian Agricultural Company	Yes	Yes	Yes	Yes
9	Libinc Oil Palm, Inc	Yes	Yes	Yes	Yes
10	Euro-Liberia Logging Company	Yes	No	No	Yes
11	Geblo Logging, Inc	Yes	Yes	No	No
12	Horizon Logging Limited	No	No	No	No
13	Kisvan Timber Corporation	Yes	Yes	Yes	No
14	Liberia Tree and Trading Company, Inc.	Yes	Yes	No	No
15	West African Forest Development Inc. (WAFDI)	No	No	No	No
16	West Water Group (Liberia), Inc.	Yes	Yes	No	No

Government agencies

N°	Government Agency	Excel RT	Signed RT	Certified RT	Audited FS
1	Liberia Revenue Authority (LRA)	Yes	No	No	N/A
2	National Oil Company of Liberia (NOCAL)	Yes	No	N/A	No
3	Liberia Petroleum Regulatory Authority (LPRA)	Yes	No	N/A	N/A
4	National Port Authority (NPA)	Yes	No	N/A	N/A
5	Environmental Protection Agency (EPA)	Yes	No	N/A	N/A
6	Ministry of Mines and Energy (MME)	Yes	No	N/A	N/A
7	Ministry of Agriculture (MoA)	No	No	N/A	N/A
8	Forestry Development Authority (FDA)	Yes	No	N/A	N/A

Annex 10: MME confirmation regarding out-of-scope companies



Annex 11: FDA confirmation regarding out-of-scope companies

No.	Company Name	Operation Types	Contract Types	Operation Status
1	Sino Forest International Corporation Liberia Inc.	Logging Operator	Community Forest Management Agreement (CFMA)	Active
2	Horizon Logging Limited	Logging Operator	Community Forest Management Agreement (CFMA)	Active
3	KISVAN TIMBER CORPORATION	Logging Operator	Community Forest Management Agreement (CFMA)	Active
4	Masayaha Logging	Logging Operator	Community Forest Management Agreement (CFMA)	Active
5	STADIUM INC.	Buyer & Exporter	No Contract	Active
6	LTTC Inc.	Logging Operator	Community Forest Management Agreement (CFMA)	Active
7	INDO AFRICAN PLANTATIONS LIBERIA INC	Logging Operator	Community Forest Management Agreement (CFMA)	Inactive
8	L&S RESOURCES INC	Logging Operator	Community Forest Management Agreement (CFMA)	Active
9	Geblo Logging Inc	Logging Operator	Forest Management Contract (FMC)	Active
10	WEST AFRICAN FORESTRY DEVELOPMENT INC	Logging Operator	Community Forest Management Agreement (CFMA)	Active
11	Mandra Forestry Liberia Ltd	Logging Operator	Forest Management Contract (FMC)	Inactive
12	Akewa Groups of Companies	Logging Operator	Timber Sales Contract & Community Forest Management Contract	Inactive
13	Euro Liberia Logging Company	Logging Operator	Forest Management Contract (FMC)	Active
14	Alpha Logging and Wood Processing Inc	Logging Operator	Forest Management Contract (FMC)	Inactive
15	Coveiyalah Investment Enterprises, Inc.	Logging Operator	Community Forest Management Agreement (CFMA)	Inactive



REPUBLIC OF LIBERIA
FORESTRY DEVELOPMENT AUTHORITY (FDA)

RUDOLPH J. MERAB, SR.
MANAGING DIRECTOR

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MD/058/2025/-01

June 23, 2025

Mr Jeffrey N. Yates
Head of Secretariat
LEITI
Old Bureau of Budget
Executive Masion
Monrovia, Liberia

Dear Hon. Yates

The Management of the Forestry Development Authority presents its compliments and wishes to inform you that Horizon Logging Limited, and West African Forest Development Inc. (WAFDI) are no longer in operation. We will engage the remaining companies to comply by submitting the relevant data to the Independent Administrator (IA) as part of the ongoing process.

We appreciate your understanding as we work together to ensure Liberia's successful validation.

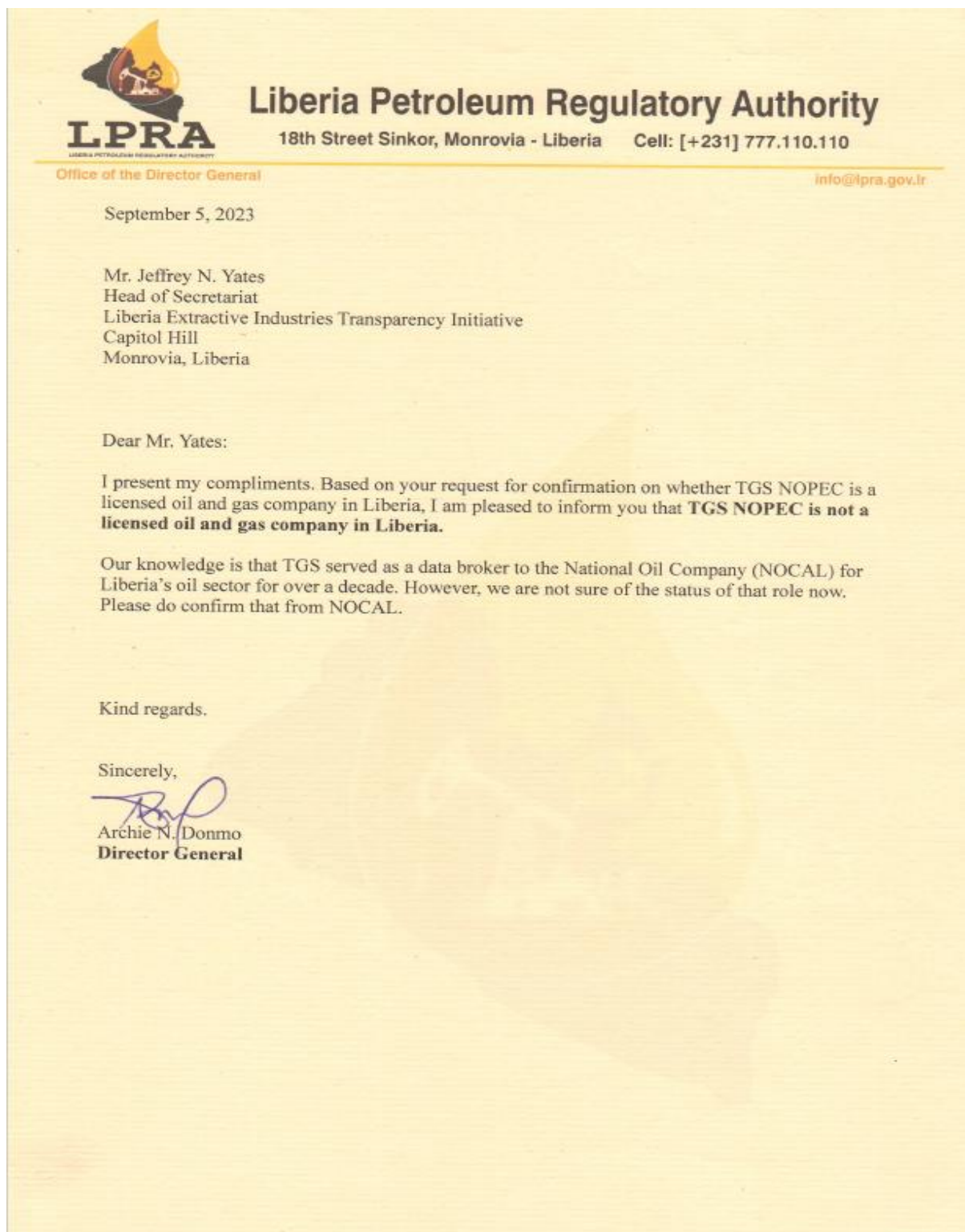
Thank you once again for your cooperation.

Kind regards,

Sincerely yours,

Rudolph J. Merab, Sr.
MANAGING DIRECTOR

Annex 12: LPRA confirmation regarding out-of-scope companies



Annex 13: Payment details of out-of-scope companies

Please refer to the separate Annex to this report.

Annex 14: IA team

HLB LIBERIA, LLC	
Ernest Parker	Partner
Richard Roy Montgomery	Manager

BDO LLP	
David Dicker	Partner
Hedi Zaghouani	Director
Achraf Kanoun	Senior Manager
Wisseem Zaazaa	Junior Manager