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Transparency in the Peruvian Energy Sector

2014 DIAGNOSIS

EXECUTIVE SUMMARY

With support from:



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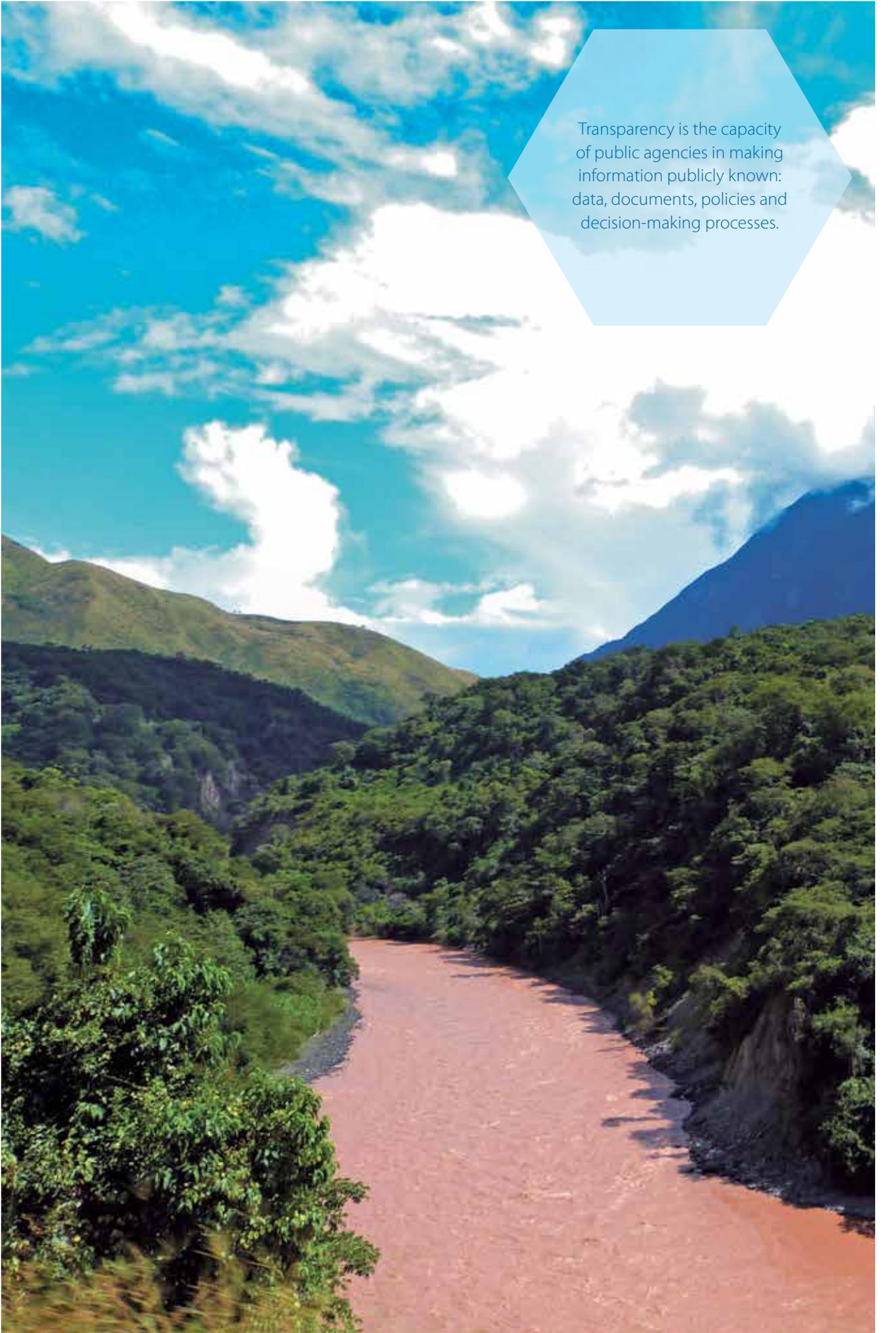
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ABBREVIATIONS AND ACRONYMS

Photo: Mario Zúñiga / DAR

ANA	National Water Authority
EIA	Environmental Impact Study
EITI	Extractive Industries Transparency Initiative
ELECTROPERU	Electroperu S.A. Electricity Company of Peru
GORECU	Regional Government of Cusco
GOREL	Regional Government of Loreto
MEF	Ministry of Economy and Finance
MINAGRI	Ministry of Agriculture and Irrigation
MINAM	Ministry of Environment
MINCU	Ministry of Culture
MINEM	Ministry of Energy and Mines
OEFA	Agency for Environmental Assessment and Control
OSINERGMIN	Supervision Agency for Investment in Energy and Mining
OGP	Open Government Partnership
OSF	Open Society Foundations
PCM	Presidency of the Council of Ministers
PERUPETRO	Perupetro S.A.
PETROPERU	Petroleum from Peru PETROPERU S.A.
PROINVERSION	Agency for the Promotion of Private Investment
SERNANP	National Service of Natural Areas Protected by the State
INGEMMET	Geological, Mining and Metallurgical Institution



Transparency is the capacity of public agencies in making information publicly known: data, documents, policies and decision-making processes.

1. INTRODUCTION

In the past few years, Peru has been promoting various investment projects in oil and hydroelectric energy plants located in the Peruvian Amazon, which has 33 hydroelectric plants and numerous hydrocarbon blocks overlapping 84% of its territory (RAISG 2012). As an area renowned for its biological and cultural wealth, greater safeguards are necessary to ensure that investments are sustainable.

Pressure for the use of natural resources in many parts of the country has been accompanied by a growing scenario of social conflict, where the public's mistrust of its authorities has become visible. This happens due to weaknesses in the implementation of public policies, the limitations of environmental institutionalism, the reduced recognition of socio-environmental safeguards and standards, low effectiveness in the implementation of planning tools, management of territories and energy resources, and the lack of respect for human and indigenous rights, among other aspects.

Therefore, the implementation of good government or governance practices is necessary, defined as a new way of governing in coordination with different actors from society, promoting their participation in public decision-making, based on a series of principles, such as: planning processes, policies, plans and programs; management capacity; coordination between government and intersectoral levels, accountability from authorities towards citizens; citizen participation; public integrity which promotes ethical behaviour and prevents corruption; and transparency and access to public information (DAR 2012; Gamboa 2013). Nevertheless, for the purpose of this diagnosis, transparency and access to public information are cross-cutting elements to other governance principles.

Transparency is the capacity of public agencies in making information publicly known: data, documents, policies and decision-making processes; which includes the possibility of citizens verifying their accuracy. Moreover, the right of access to public information is a fundamental human right, contained in the right to freedom of thought and expression, enshrined at the international level in various instruments and, in the environmental issue, this right is enshrined in Principle 10 of the Declaration of Rio on Environment and Development, from the UN in 1992.



Photo: Mario Zúñiga / DAI

At the national level, the main regulatory framework for transparency and access to information is the one developed by the Constitution of Peru of 1993, and, subsequently, the National Agreement of 2002, the Framework Law on Modernization of the State Administration and the Law of Transparency and Access to Information and its regulation.

In spite of the progress made in various sectors at the national and regional levels, challenges are greater in the consolidation of a transparent State which will include this principle in its entire structure.

Within the energy sector, it is crucial to continue promoting transparency and the adequate exercise of the right of access to public information in institutional development, as well as the principles of governance in crucial processes such as: the granting of rights (tenders and contracts) for the use of hydrocarbons and for hydroelectric plants; as well as evaluations of Environmental Impact Assessments - EIA in these subsectors. Many entities have made progress with regards to indicators developed in 2013 on portals for transparency and access to information, but we still need greater efforts to ensure that public information is accessible to people in rural and remote areas of the Amazon, those with disabilities or who cannot read or write. Furthermore, still pending are alternative mechanisms to promote transparency and access to public information for vulnerable groups, through an intercultural approach.

In this regard, the present diagnosis shows the results obtained through evaluations conducted in 2014 in comparison with the assessment from 2013. This comparison shows that transparency and access to information in the energy sector must be prioritized - in accordance with the **Law of Transparency and Access to Public Information** and related standards, standards of citizen participation, planning, coordination, accountability, anti-corruption and compliance with international commitments signed by Peru on transparency- to promote efficient management in the development of energy resources, **generate greater public confidence** in public institutions, **reduce social conflicts, increase State legitimacy and prevent corruption**.



Photo: Mario Zúñiga / DAR

2. TRANSPARENCY INITIATIVES AND ACCESS TO INFORMATION AT INTERNATIONAL AND NATIONAL LEVELS

Transparency is a key element in the empowerment of the State and its citizens. It refers to the public knowledge of data, documents, information, policies and decision-making processes concerning the activity of State agencies, including the possibility of citizens to verify their accuracy.

Hence, it consists of a double track: on the one hand, the State makes the information corresponding to their actions and decisions public, and, on the other, citizens can require it when they consider the full knowledge of the public interventions necessary. To that extent, the right of access to information is essential (Ombudsman's Office 2010; 2010a; 2012).

In this manner, the right of access to information is a human right contained in the right to freedom of thought and expression, based on tools such as the Universal Declaration of Human Rights of 1948 (articles #12 and #19); the International Covenant on Civil and Political Rights of 1966 (articles #17 and 19); the American Declaration on the Rights and Duties of Man of 1948 (article # 4), the American Convention on Human Rights 1969 (articles #11 and 13); the Declaration of Nueva Leon of the States of the Americas in 2004; the Statement of Principles on the Freedom of Expression of 2000; the Principles of Lima 2000; Principle 10 of the UN's Rio Declaration on Environment and Development of 1992; and the Aarhus Convention (Convention on access to information, public participation in decision-making and access to justice in environmental matters) adopted in 1998 by the United Nations Economic Commission for Europe (Special Rapporteur on Freedom of Expression 2007: 12-16).

The main bodies that develop this right are the Special Rapporteur for Freedom of Opinion and Information, created in 1993 by the United Nations Commission on Human Rights, and the Special Rapporteur for Freedom of Expression which was created in 1992 by the Inter-American Commission on Human Rights (*ibid*).



Photo: José Serra

In Peru, the momentum of transparency and the right of access to information are started in the process of modernization of the State with the Framework Law on Modernization of State Management (Law # 27658) and its Regulation (Supreme Decree # 030-2002-PCM). Subsequently, a significant milestone was the signing, in July 2002, of the National Agreement, which included eight national policies related to the promotion of an “efficient, transparent and decentralized State”, one of which was the twenty-sixth National Policy: promotion of ethics and transparency and the eradication of corruption, money laundering, tax evasion and smuggling in all its forms. Subsequently, the Consolidated Text of the Law # 27806, Law of Transparency and Access to Public Information (Supreme Decree # 043-2003-PCM) and its Regulation (Supreme Decree #072-2003-PCM, as amended by Supreme Decree #070-2013-PCM) were enacted. Finally, an important tool is the “Bicentennial Plan of 2010: Peru towards 2021” (approved in 2011), which incorporates Strategic Axis 3: State and Governance, the promotion of transparency and the right to access public information.

This regulatory framework develops other legal instruments and, mainly, two mechanisms implemented as portals, such as the standard of transparency and access to information requests. However, this is not enough to adequately ensure this law and the principle of transparency, which is why, in 2012, the Ombudsman’s Office, through the Ex Officio # 1359-2012-DP, submitted to the Chair of the Council of Ministers (PCM) the creation of a National System and an Autonomous Authority of Transparency and Access to Public Information to direct the policy of transparency, the processes, procedures, penalties, capabilities and appropriate standards for the consolidation of a transparent and corruption-free State, an endeavor which presently is not carried out by any State institution.

At the international level, Peru has also made commitments, as it has been integrated to global initiatives that promote transparency and the fundamental right of access to public information such as the **Open Government Partnership, the Extractive Industries Transparency Initiative (EITI) and the Partnership for Transparency in the Extractive Industries of the G8**.

The Open Government Partnership (OGP) is composed of 64 countries; Peru is an Official Party since 2012 with the approval from the 2012-2014 Open Government Action Plan for Peru (Ministerial Resolution #085-2012-PCM), which links various objectives to be achieved by the different sectors. Thus, in 2013 a multisectoral commission was set up for the permanent monitoring of the implementation of the Open Government Action Plan (Supreme Decree #003-2013-PCM), attached to the PCM and comprised by institutions of the State, civil society organizations and the business sector¹. In January and February 2014, regional workshops were held for the preparation of the 2014-2016 Action Plan in Ayacucho, Piura, San Martin and Lima, with participation from the civil society, the business sector and government entities. The timetable

¹ The members (official and alternate) of the Multisectoral Commission are: the Secretary General of the PCM (who presides); two representatives of the Secretariat of Public Management - GSP, the National Office of Electronic and Information Government - ONGEI, the Ministry of Justice and Human Rights, the Ministry of Foreign Affairs and the Judiciary branch; the National Confederation of Business Institutions - CONFIEP and the Lima Chamber of Commerce of business organizations; two representatives from the civil society organization Proetica; Citizens to Date - CAD and of the Council of the Peruvian Press as part of civil society. The Ombudsman’s Office, the Office of the Comptroller General of the Republic and the High Level Commission against corruption - CAN are invited as observers.

The Open Government Partnership (OGP) is composed of 64 countries; Peru is an Official Party since 2012 with the approval from the 2012-2014 Open Government Action Plan for Peru.

for the preparation of the Plan stated that it was to be adopted in April of this year, however, due to the numerous changes of PCM officials who drove the Partnership, this has not happened as of yet. The process is currently paralyzed; it has failed to comply with the commitments made by the Peruvian State, garnering a reprimand by the OGP to the Peruvian State².

For its part, the Extractive Industries Transparency Initiative (EITI) is an international strategic alliance composed of 37 countries bringing together governments, extractive industry companies (mining, oil and gas) and civil society to employ criteria of transparency in the payments they make companies to governments and income that they receive from these companies in order to verify that the resources will promote development in countries. In 2005, Peru acceded this initiative, which is why, in 2006, Working Committee for the implementation of EITI was created (Supreme Decree # 027-2006-EM, extended by Supreme Decree # 030-2007-EM, Supreme Decree D. S. # 044-2008-EM and Supreme Decree # 020-2010-EM) and its Action Plan approved.

In 2011, the EITI Commission in Peru was elevated to a Multisectoral Permanent Commission for the monitoring and supervision of transparency in the use of the resources the State receives through Hydrocarbon and Mining Extractive Industries (Supreme Decree # 028-2011-EM), composed through a tripartite basis (members and alternates) for the business, state and civil society sectors. The election of its members is carried out every two years; the appointment of the first members was completed in January 2013 and, three months later, the new members for 2015³ were elected. The EITI has had a major breakthrough, as it is being implemented in some regions through Multisectoral Regional Permanent Commissions, such as in Piura, Moquegua and, recently, it was reignited in Loreto by the MINEM. For next year, the first challenge is the development of the IV National Conciliation Study 2013-2014, which would incorporate the new international standard which is no longer voluntary for companies but mandatory: to publish information on 100% of mining and hydrocarbon companies operating in the country with disaggregated expenses (company by company).

Finally, as a result of the G8 summit (Germany, Canada, United States, France, Italy, Japan, United Kingdom and Russia, which has been temporarily excluded) in 2013, Peru and Canada (the latter on behalf of the G8) established a cooperation framework to guide the implementation of the “Partnership to Promote Transparency in the Extractive Sector” in the country. In this manner, Peru and Canada, with their partners, established this partnership, whose public launch was held in November 2013. For this matter, Canada and the Ministry of Energy and Mines (MINEM) conducted three rounds of consultations with more than 70 representatives from the public and private sectors and civil society in Peru, with the purpose of designing an action plan with indicators and responsible parties for the implementation of this initiative. In addition, this Partnership was organized through a Coordination Committee, an Advisory Committee and a Technical Secretariat in charge of Canada.⁴

In 2014, the Partnership and the EITI National Commission identified common goals to be met in the next two years, which include the dissemination of progress and results of the Partnership; the alignment of cooperation with the EITI activities, and the need to identify high-impact results. Furthermore, the EITI National Commission made specific commitments in the Partnership’s Action Plan. Finally, in October 2014, the 2014 Annual Report of the Partnership for Transparency was completed, where progress was identified at the level of efficiency in improving financial management, in transparency with the improvement of the indices of good governance and in the dialogue in regional processes.

2 View: <http://www.opengovpartnership.org/sites/default/files/141127-Letter-to-Peru.pdf>.

3 Currently, it is comprised of the State by the Ministry of Energy and Mines (MINEM) and the Ministry of Economy and Finance (MEF); from the civil society are members of the Citizen Proposal Group (GPC), the Center for Regional Andean Studies Bartolomé de Las Casas (CBC), Derecho, Ambiente y Recursos Naturales (DAR), Pontificia Universidad Católica del Perú (PUCP) and the Universidad del Pacífico (UP); and on the part of the extractive sector, the National Society of Mining, Oil and Energy (SNMPE), Southern Peru Copper Corporation and Repsol Exploration Peru Branch.

4 The Coordinating Committee is comprised of the Ministry of Energy and Mines (MINEM), the Embassy of Canada, the United States Embassy, the Embassy of Switzerland, the International Finance Corporation (IFC), the United Nations Development Program (UNDP), the Inter-American Development Bank (IADB), Derecho, Ambiente y Recursos Naturales (DAR), the Citizen Proposal Group (CPG) and the German Cooperation Agency. The Advisory Committee is composed of international cooperation organizations such as UNDP, the IFC, the Swiss Embassy, the US Embassy/USAID, the German Cooperation Agency and the Inter-American Development Bank (IADB). Participating civil society organizations are the Institute of Peruvian Studies (IEP), CPG and DAR; regarding the extractive industry companies, participants are the mining companies HudBay, Rio Tinto, Antamina, Xstrata-Glencore and the National Society of Mining, Oil and Energy (SNMPE); the State is represented by the Ministry of Energy and Mines (MINEM).



Photo: Gisella Valdivia

3. METHODOLOGY

The 2014 Diagnosis: Transparency in the Peruvian Energy Sector presents the level of transparency and access to public information of public agencies in the management, promotion, use and evaluation of energy resources in Peru.

through the assessment of the State's ability to produce, disseminate and provide citizens with information that is relevant, accessible, clear, comprehensible, reliable, timely and of quality, through transparency mechanisms, the attention to access to information requests; processes for granting of rights to the use of hydrocarbons and for the construction of hydroelectric dams; and the evaluation processes of environmental impact studies.

This analysis offers recommendations for the Government of Peruvian at national and regional levels, with the objective of entities from the energy sector improving their tools and standards of transparency and access to public information for the benefit of energy governance.

The 2014 Diagnosis evaluates and analyzes three aspects:

- **Aspect 1:** Transparency portals of public agencies.
- **Aspect 2:** Access to public information of public agencies.
- **Aspect 3:** Transparency for energy governance in:
 - a) Processes for granting rights in hydrocarbon extraction and hydroelectric plants.
 - b) Processes for evaluation of environmental impact assessments in hydrocarbon extraction and hydroelectric plants.
 - c) Management of Loreto and Cusco Regional Governments.



Photo: Mario Zúñiga / DAR

The public agencies evaluated are those with direct and indirect competencies in the management, promotion, use and evaluation of energy resources:

- **Agencies with direct competencies in the energy sector**

- Private Investment Promotion Agency - PROINVERSION
- Electricity Company of Peru - ELECTROPERU S.A.
- Ministry of Energy and Mines - MINEM
- Ministry of Environment - MINAM
- Agency for Assessment and Environmental Control - OEFA
- Supervising Agency for Investment in Energy and Mining - OSINERGMIN
- Perupetro S.A.
- Petróleos de Peru - PETROPERU S.A.
- Geological, Mining and Metals Institute - INGEMMET (newly evaluated institution in the 2014 diagnosis)
- Regional Government of Loreto - GOREL
- Regional Government of Cusco - GORECU

The regional governments of Loreto and Cusco were chosen to be analyzed in this diagnosis, since these are two regions with large and important investment projects. These regional governments culminated with the transfer of functions in the field of energy and mines, according to Ministerial Resolution # 046-2008-EM-DM (published on February 2nd, 2008) and Ministerial Resolution # 009-2008-MEM/DM (published on January 16th, 2008).

- **Agencies with indirect powers in the energy sector**

- National Water Authority - ANA
- Ministry of Agriculture and Irrigation - MINAGRI
- Ministry of Culture - MINCU
- Ministry of Economy and Finance - MEF
- Presidency of the Council of Ministers - PCM
- National Service of Protected Areas by the State - SERNANP

The *2014 Diagnosis* is of arrays that contain a set of indicators and verification means that make it possible to assess and monitor the situation of transparency and access to information in 2014, compared with the assessment performed in 2013.

The assessment of transparency portals has the purpose of obtaining an objective reading of updates in transparency portals (institutional and standard) of the government agencies during the first half of 2014, in comparison to the results obtained in 2013. The collection has been carried out in a quarterly basis to identify in which period there is greater availability of information from public agencies. Indicators have been developed from the Unique Ordered Text of Law # 27806, Law of Transparency and Access to Public information (Supreme Decree

#043-2003-PCM); the Ministerial Resolution # 301-2009-PCM which approves the "Guidelines for the Implementation of the Standard Portal of Transparency in Public Administration Entities" (Directive # 001-2010-PCM/GSP) making it mandatory to have certain information in Standard Transparency Portals; Ministerial Resolution # 203-2012-PCM amending article 10 of Directive # 01-2010-PCM/GSP, with which the Standard Transparency Portals have from nine to ten thematic items with specific information; and Supreme Decree # 070-2013-PCM Amending the Rules of the Law of Transparency and Access to Public Information (Supreme Decree # 072-2003-PCM).

The *assessment of access to public information* intends to obtain an objective reading of the compliance of indicators created on the basis of legislation for attention and service of access to information held by public agencies, as well as responsiveness to requests for access to information, during the first half of 2014, in comparison with results obtained in 2013. Indicators have been developed in the framework of the Unique Ordered Text of Law # 27806, Law of Transparency and Access to Public Information (Supreme Decree # 043-2003-PCM) and its Regulation (Supreme Decree # 072-2003-PCM, as amended by Supreme Decree # 070-2013-PCM). The indicator of the effectiveness of information has been based on how long the entity takes to respond to requests for access to information, while the indicator of the quality of information has been based on the verification of the entity's responses. The information recorded on the indicators has been entreated through the requests for access to public information, through briefings and telephone communications.

The *assessment of transparency for governance* has the purpose of analyzing transparency as a cross-cutting aspect of the criteria of governance: planning, capacity management, coordination, participation, accountability and public integrity, in the important processes within the energy sector.

In the case of the granting of rights to hydrocarbons, the reference has been the Unique Ordered Text of Law # 26221, Organic Hydrocarbons Law (Supreme Decree # 042-2005-EM); the Law on Organization and Functions of PERUPETRO S.A. (Law # 26225); the Regulation of Classification of Oil Companies (Supreme Decree # 030-2004-EM); the Regulation for the Exploration and Exploitation of Hydrocarbons (Supreme Decree # 032-2004-EM); the Regulations for Environmental Protection in Hydrocarbon Activities (Supreme Decree # 015-2006-EM); the Regulation for Public Participation in Hydrocarbon Activities (Supreme Decree # 012-2008-EM); the Guidelines for Citizen Participation in Hydrocarbon Activities (Ministerial Resolution # 571-2008-MEM-DM) and internal procedures of PERUPETRO.

In the granting of rights for hydroelectric plants, the Law for Electric Concessions (Legal Decree # 25844) and its Regulation (Supreme Decree # 009-93-EM) were used as a reference; the Guidelines for Public Participation in Electricity activities (Ministerial Resolution # 223-2010-MEM-DM) and the Regulation of Environmental Protection in Electricity activities (Supreme Decree # 29-94-EM).

With regards to environmental assessment process for hydrocarbons and hydroelectric plants, the reference was the Law for the National System of Environmental Impact Assessment (Act # 27446) and its Regulation (Supreme Decree # 019-2009-MINAM); the Regulation for Citizen Participation in Hydrocarbon activities (Supreme Decree # 012-2008-EM); the Guidelines for Citizen Participation in Hydrocarbons activities (Ministerial Resolution # 571-2008-EM/DM); the Regulations for Environmental Protection in Electricity activities (Supreme Decree # 29-94-EM); Guidelines for Citizen Participation in Electricity activities (Ministerial Resolution # 223-2010-MEM/DM); and the Regulation on Transparency, Public Access to Environmental Information and Participation and Citizen Consultation in Environmental Matters (Supreme Decree # 002-2009-MINAM).

Prior to the development and completion of the *2014 Diagnosis*, internships were carried out in the Regional Governments of Loreto and Cusco, in order to perform a comprehensive analysis of the capacities and application of transparency and access to information during the months of March and June. In addition, there was a validation process for indicators of arrays and of the results obtained through meetings with officials of the monitored entities and with civil society organizations at national and regional levels. In that sense, during the months of July, August, September and October, meetings were planned with the goal of presenting the indicators, assessments and results of the *2014 Diagnosis*, to collect contributions and clarify observations. Finally, regional workshops were held in Iquitos, Cusco and Lima in November in order to present and validate the final results of the *2014 Diagnosis*. After the completion of these activities, the necessary changes were made and the new recommendations included.

The assessment of access to public information intends to obtain an objective reading of the compliance of indicators created on the basis of legislation for attention and service of access to information held by public agencies.



Photo: Liliana García / DAR

4. MAIN FINDINGS

The main findings of the 2014 Diagnosis show that there is still great ignorance of the public officials and citizens on the functions of transparency and the right of access to information, as well as of the current legislation which regulates this right.

At the same time, commitments made by Peru, such as the Open Government Partnership - OGP, the Extractive Industries Transparency Initiative – EITI, and the Alliance for the Transparency of the G8, are little known at the regional level and still less known by the population.

Regarding transparency portals of public entities:

- The quarterly update of the Standard Transparency Portals (STP) of the evaluated institutions has improved in comparison to 2013, achieving an average of 81% compliance from institutions with direct competencies and an average of 86% compliance from institutions with indirect powers in the management, promotion, use and evaluation of energy resources during the second quarter of 2014.
- During the second quarter of 2014, MINAM reached 100% compliance in its transparency portals, followed by MINEM, ELECTROPERU and MINAGRI and with 98 %. While the lowest percentages were found in ANA with 53% and PETROPERU with 52 %, a situation that should change as ANA holds important information for the use of water resources and PETROPERU on hydrocarbons in the country.

Results in Standard Transparency Portals / 2014 - Second Quarter

AGENCY	YES	%	NO	%	PARTIAL	%
MINEM	57	98%	0	0%	1	2%
MINAM	58	100%	0	0%	0	0%
ELECTROPERU	57	98%	1	2%	0	0%
OSINERGMIN	56	97%	2	3%	0	0%
OEFA	44	76%	14	24%	0	0%
PERUPETRO	52	90%	6	10%	0	0%
PETROPERU	30	52%	24	41%	4	7%
PROINVERSION	33	57%	20	34%	5	9%
INGEMMET	37	64%	16	27%	5	9%
LORETO RG	46	75%	7	12%	8	13%
CUSCO RG	53	87%	8	13%	0	0%
MINAGRI	57	98%	3	2%	0	0%
SERNANP	52	90%	6	10%	0	0%
MINCU	56	97%	2	3%	0	0%
ANA	31	53%	27	47%	0	0%
MEF	48	83%	10	17%	0	0%
PCM	54	93%	4	7%	0	0%

YES : Where information is found in a complete and comprehensive manner
NO : Where no information is found
PARTIAL : Where information is unfinished, incomplete, outdated or document is displayed in a limited fashion.

Prepared by: Gamboa and Vargas

- From the evaluations carried out between 2013 and 2014, it can be verified that the institutions have been progressing in each quarter. It is apparent that, in the second quarter of 2014 most institutions have reached a good performance their standard transparency portals. Regarding the institutions with direct competencies, these have had an increase in compliance of 25%, as during the first assessment of 2013 they had an average of 56%. With regards to the institutions with indirect competencies, it is noted that these have had an increase in compliance of 21%, as during the first assessment of 2013 they had an average of 65%.

Quarterly Comparison of Results in Standard Transparency Portals - STP 2013 - 2014

INSTITUTIONS	STP 2013-II	STP 2013-III	STP 2014-I	STP 2014-II
MINEM	93%	76%	98%	98%
MINAM	80%	95%	97%	100%
ELECTROPERU	81%	87%	84%	98%
OSINERGMIN	47%	63%	60%	97%
OEFA	59%	38%	60%	76%
PERUPETRO	7%	41%	81%	90%
PETROPERU	5%	43%	10%	52%
PROINVERSION	47%	68%	53%	57%
INGEMMET	-	-	-	64%
GOREL	77%	86%	90%	75%
GORECU	60%	58%	80%	87%
MINAGRI	71%	92%	97%	98%
SERNANP	49%	73%	76%	90%
MINCU	68%	98%	96%	97%
ANA	53%	29%	48%	53%
MEF	75%	75%	74%	83%
PCM	71%	86%	78%	93%

Prepared by: Gamboa and Vargas

Results on the accessibility of information in institutions with direct competencies 2013 - 2014

INSTITUTIONS	N° of Clics 2013 - II	N° of Clics 2013 - III	N° of Clics 2014 - I	N° of Clics 2014 - II
MINEM	3.8	3.6	3.4	3.3
MINAM	3.6	3.5	3.2	2.7
ELECTROPERU	3.2	2.9	3.6	3.1
OSINERGMIN	3.1	3.3	3.5	3.2
OEFA	2.9	3.3	3.5	2.9
PERUPETRO	2.8	2.9	3.2	3.1
PETROPERU (*)	1.8	2.7	2.2	2.8
PROINVERSION	3.0	3.3	3.1	3.0
INGEMMET	-	-	-	2.9
GOREL	3.0	3.4	3.2	3.1
GORECU	2.7	3.1	3.0	3.4
PROMEDIO	3.0	3.2	3.2	3.0

KEY

Greater difficulty



Lower difficulty

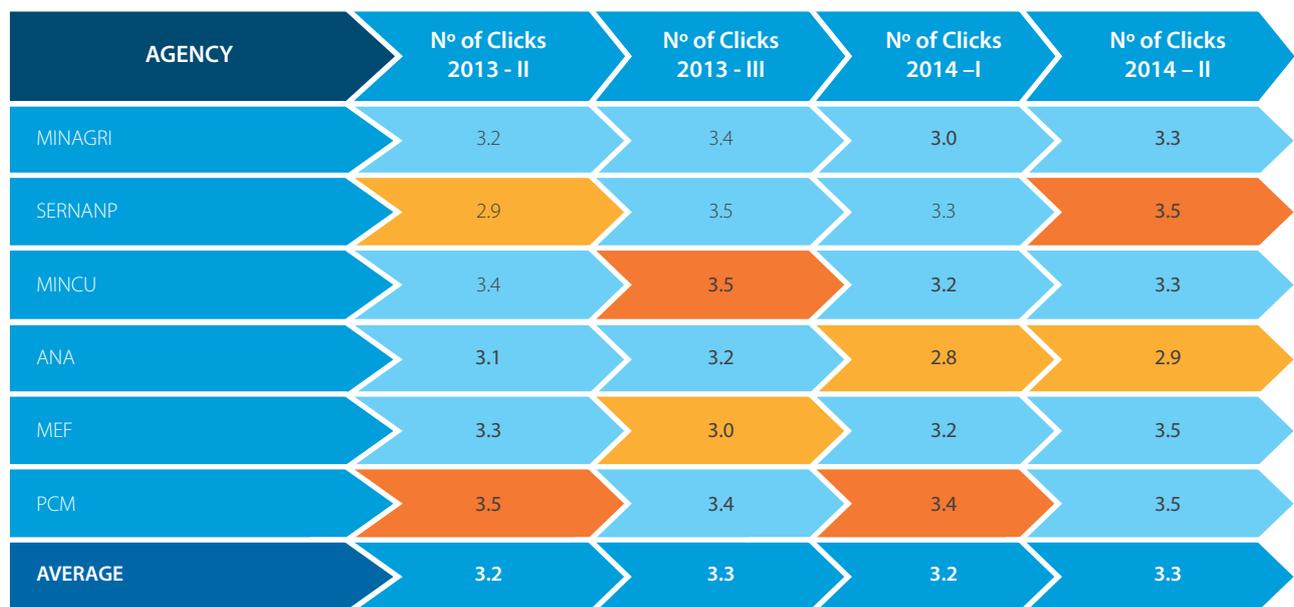


(*) While PETROPERU is the organization that needs a smaller number of clicks to find the information sought, this does not necessarily mean that it is the easiest, since their Transparency Portals do not present all items or all information.

Prepared by: Vargas

- It is necessary to work in friendlier formats in the standard transparency portals and the portals of institutional transparency, so as to allow citizens to easily access the information published in them.
- Regarding the results on information accessibility in Standard Transparency Portales, the number of clicks that a citizen has to type to find the information for each item has been assessed. In the case of the institutions with direct competencies, MINAM is the institution with less difficulty to find the information, while the Regional Government of Cusco is the institution with the greatest level of difficulty in finding the information in the second quarter of 2014.

Results on the accessibility of information in institutions with indirect competencies 2013-2014



KEY Greater difficulty  Lower difficulty 

Prepared by: Vargas

- In terms of results for information accessibility of Standard Transparency Portales through the number of clicks to access information in each item, in institutions with indirect competences, ANA is the institution with less difficulty to find the information, while SERNANP is the institution with the greatest difficulty in the second quarter of 2014.

Regarding the processes of attention to requests for access to public information:

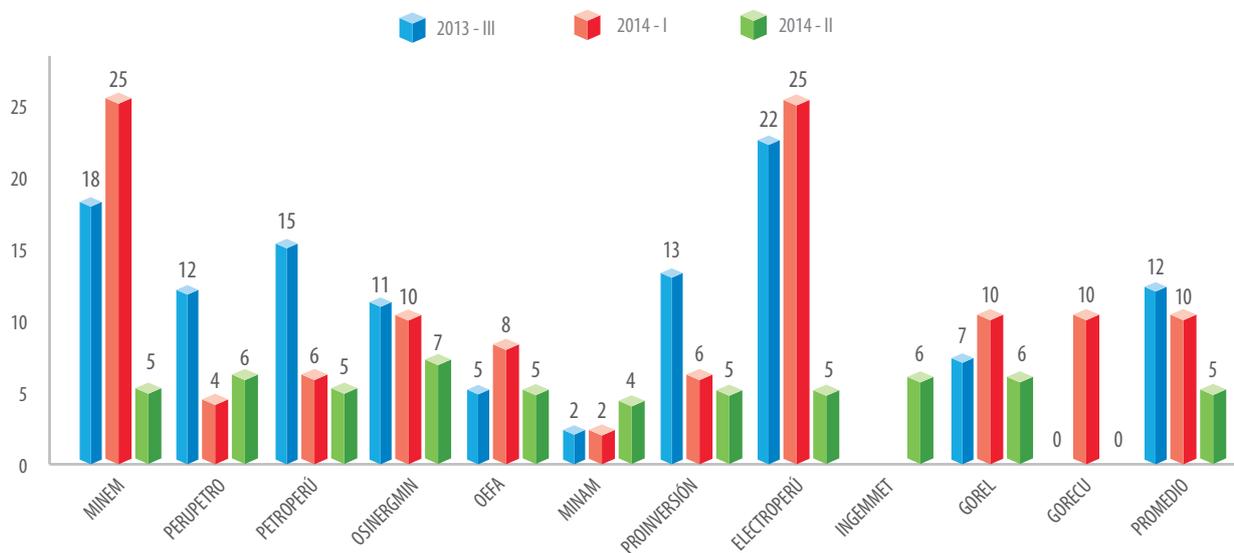
- In some cases, attention to requests for access to public information take longer than what is established by law, mainly due to the fact that the information is not systematized or digitalized. However, there has been improvement in terms of response time of applications for access to information.
- On average, entities with direct competencies in management, promotion, use and evaluation of energy resources have required five days to respond to information requested by users. Up to 91% of entities responded within the allotted time and only 9% did not respond (GORECU) during the second quarter of 2014.

Number of days to obtain information of institutions with direct competencies Second Quarter 2014



Prepared by: Vargas

Quarterly Comparison of the number of days needed to obtain information in institutions with direct competencies 2013-2014

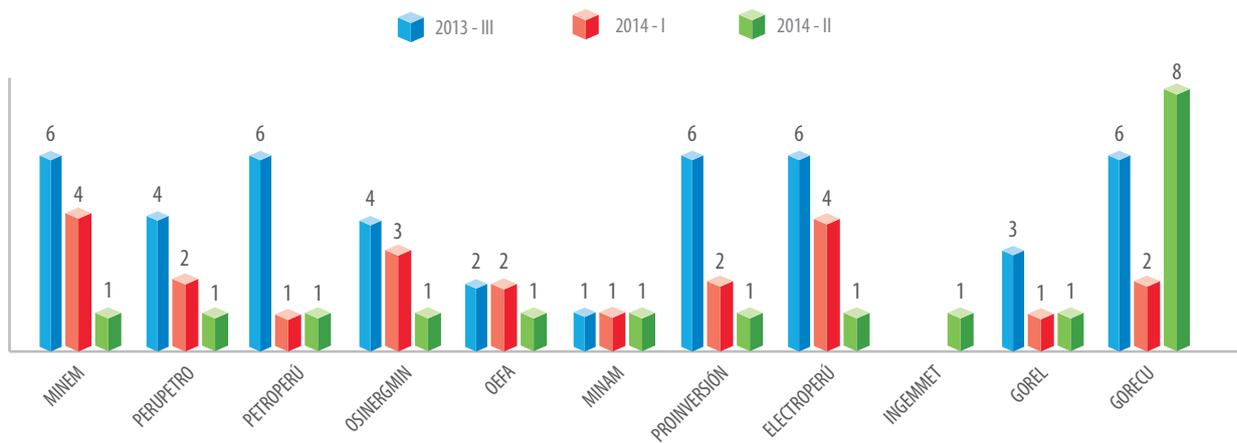


Preparation: Vargas

- There has been an improvement in the quality of information availability in most of the public entities with direct competencies in management, promotion, and use and evaluation of energy resources during 2014. This indicator has been analyzed based on the opportunity and the quality of the information delivered (where 1: higher quality and 8: lower quality). In this manner, most institutions improved quality during the second quarter.
- For the third consecutive term, MINAM is the entity that has answered requests in a shorter time and with adequate information; it is also the entity that has provided the best quality response to information requested. This is due to the fact that they have trained staff and a system for efficiently monitoring access to the information.

- Information requested from MINEM, PETROPERU, PROINVERSION, OEFA, and ELECTROPERU was obtained in a shorter number of days than the global average, also according to requests. Similarly, the Regional Government of Loreto, Perupetro, INGEMMET and OSINERGMIN have complied with sending complete information as requested and within the indicated time limit. During the second term, the Regional Government of Cusco, did not respond to requests, so, in the second quarter of 2014, there was no response in spite of having been given a 30-day waiting period.

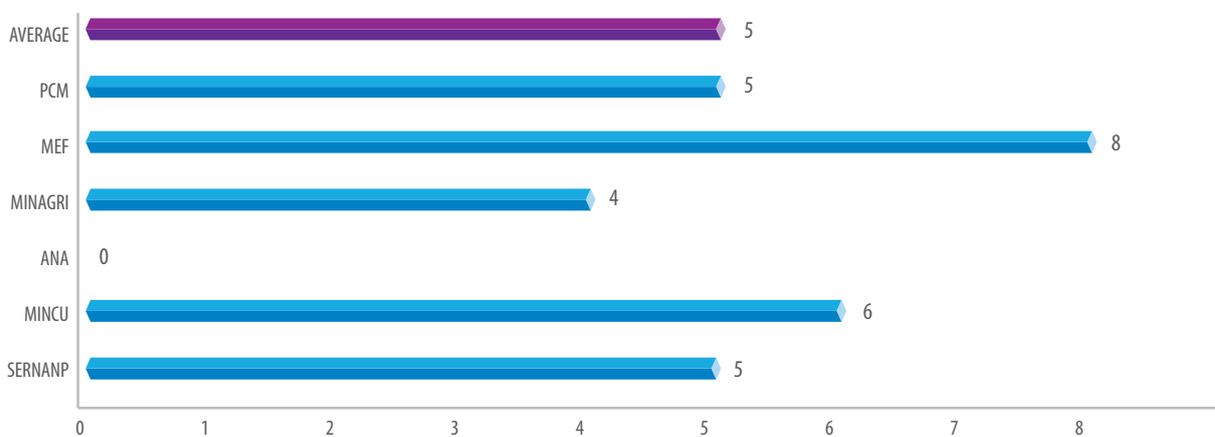
Quarterly Comparison of the Quality of Information in Institutions with direct competencies 2013-2014



Prepared by: Vargas

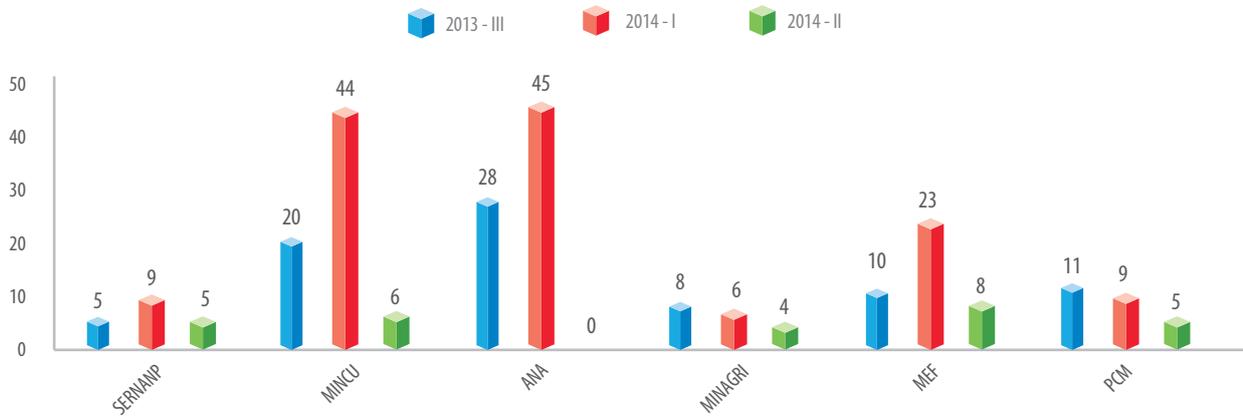
- On average, entities with indirect competencies in the management, promotion, use and evaluation of energy resources have required five days to respond and deliver the information that the user requested. Of the total number of requests, 68% of entities monitored responded to the request within the time limit set by law, 17% within and outside of this (which means that one of the applications was within the deadline and the other outside of this, as is the case of MEF, which responded to one of the requests sent outside the deadline) and 17% out of the term (ANA).

Number of days to obtain information in institutions with indirect competencies Second Quarter 2014



Prepared by: Vargas

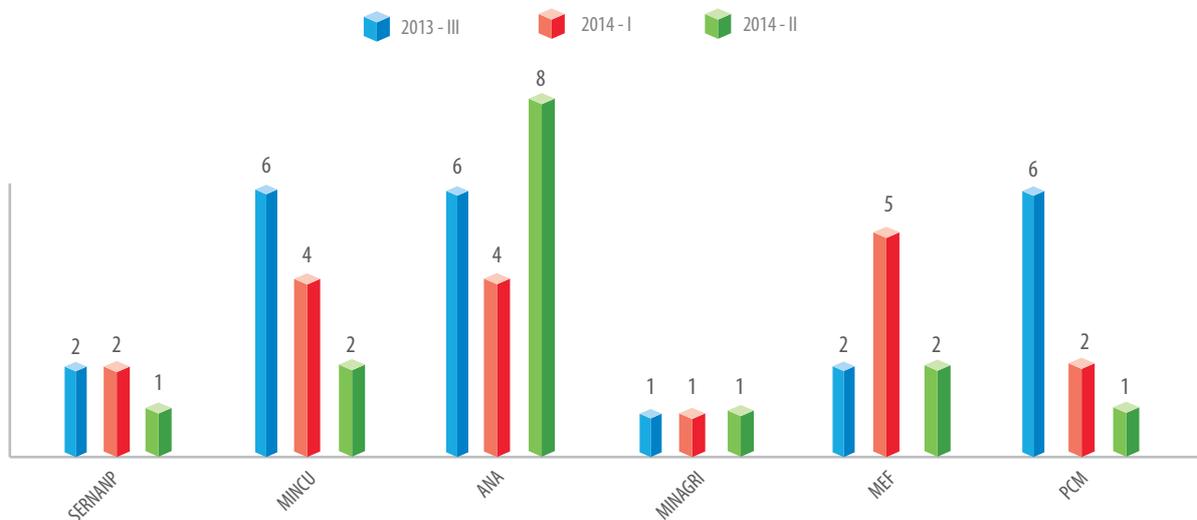
Quarterly Comparison of the number of days to obtain information in institutions with indirect competencies 2013-2014



Prepared by: Vargas

- During 2014, there has been improvement in the quality of response in the majority of public entities with indirect competencies in the management, promotion, use and evaluation of energy resources (1: higher quality; 8: lower quality).
- For the third consecutive term, MINAGRI is the entity that has replied to the requests in a shorter time and with information as requested, so that it is the best in the group in terms of quality of information provided. In addition, SERNANP, PCM and MINCU have responded in fewer days than the global average and also according to requests. MEF has responded to complete applications, although it has required more days for this work. It is worth mentioning that the ANA did not respond to information requests in the second quarter of 2014.

Quarterly Comparison of the quality of information in institutions with indirect competencies 2013-2014



Elaboración: Vargas.



Photo: Mario Zúñiga / DAR



Photo: Mario Zúñiga / DAR

- Most institutions are still limited in the implementation of mechanisms for access to differentiated information for the diversity of actors that exist in the country, where they consider their own characteristics such as language, interests and access to technology. In the case of the entities with direct competencies, only 40% have alternative mechanisms for vulnerable populations; while 68% of the entities with indirect powers have these mechanisms.
- The greatest amount of requests for information access is conducted through virtual formats in the entity's transparency portals and the majority of users request that the answers be carried out through the e-mails, which is a fast mechanism for the officer who provides the information and for citizens.
- Entities with direct competencies in management, promotion, use and evaluation of energy resources have improved, compared to 2013, in the implementation of mechanisms for the attention of information access. In this regard, during the second half of 2014, 90% of entities have a system for tracking and monitoring applications, a system for computer security, a mechanism for user orientation, a document or directive on the institutional policy on transparency and access to the information, and identifies the most required information by users. Also, 100% has conducted trainings in transparency and access to information to the staff.
- Entities with indirect competencies in the management, promotion, use and evaluation of energy resources have improved in comparison to 2013, in the implementation of mechanisms for information access. In this regard, the second half of 2014, 67% have a system of tracking and monitoring applications, a mechanism for user orientation and can identify the most requested items from users. Moreover, 83% have a computer security system, conduct trainings on transparency to the staff, and have a document or directive on institutional policy on transparency and access to information.

Entities with direct competencies in management, promotion, use and evaluation of energy resources have improved, compared to 2013.

Results of information collected through access to public information

CRITERION	INDICATOR	UNIT OF MEASURE	MINEM	PERUPETRO	PETROPERU	OSINERGMIN	DEFA	MINAM	PROINVERSION	ELECTROPERU	INGEMMET	GOREL	GORECU	SERNANP	MINCU	ANA	MINAGRI	MEF	PCM		
Planning management capacity in the attention of access to public information	I. Existence of an institutional policy of transparency	Has an institutional policy regarding transparency and access to information (document or directives that implement such a policy).	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	NSOC	YES	YES	NSOC	YES	YES	YES		
			YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	NCOR	YES	YES	NSOC	YES	YES	YES	
	II. Implementation of mechanisms for access to information	Has a mechanism for directing the user to respond their queries or requests for information not published (guidance office or another).	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	IP	YES	YES	YES	YES	
			YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES
			YES	YES	YES	NOT	YES	YES	YES	NO	NO	NO	NO	YES	NO	YES	YES	NO	YES	NO	YES
	III. Implementation of a system for tracking and monitoring the access to information requests	Identifies types of information needed by users through requests for access to the face-to-face and virtual information (has a database of this information).	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	IP	YES	
			YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES
			YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	NSOC	YES	YES	NSOC	YES	NO	YES
			YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES
	IV. Personnel and training the staff of transparency and access to information	Has a system for tracking and monitoring of the requests for information via e-mail window.	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	
			YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	NSOC	YES	NSOC	YES	YES	YES	YES
			YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	NSOC	YES	NSOC	YES	YES	YES	YES
	V. Budget	Has officials who are responsible for delivering information which is publicly accessible.	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	NSOC	YES	YES	NSOC	YES	YES	YES	
			YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES
			Has mechanisms for training and incentives to staff responsible for transparency and access to public information.	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	
		Has information on the annual budget for the system of transparency and access to information.	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	NSOC	YES	YES	NSOC	YES	YES	YES		

CRITERION	INDICATOR	UNIT OF MEASURE	MINEM	PERUPETRO	PETROPERU	OSINERGMIN	OEFA	MINAM	PROINVERSION	ELECTROPERU	INGEMMET	GOREL	GORECU	SERNANP	MINCU	ANA	MINAGRI	MEF	PCM	
Evaluation of the services and attention to the citizen in processes of access to public information	I. Implementation of a system of assessment of the institutional policy of transparency	Has a mechanism to know the level of perception of transparency of the entity.	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	
	II. Implementation of a monitoring of the functioning of the mechanisms for access to information	Has a mechanism on the overall rating of the service of transparency and access to public information it provides.	NOT	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	
	III. Evaluation of the system for the monitoring and evaluation of requests for access to public information	Identifies the track for the majority of information requested (webpage, request, publications, other) and the type of information most required.	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES
		Has a mechanism on the qualification of alternative attention mechanisms for vulnerable populations.	YES	YES	YES	YES	NOT	YES	NO	YES	YES	YES	YES	IP	YES	YES	NO	YES	NO	NO
	IV. Continuity in the training of the staff of transparency	Has a study on the estimated time in which the institution sends responses to requests for access to public information.	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES
		The entity has implemented a mechanism to improve the care of the requests for access to information and modify the delays and non-responses from this assessment.	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES
V. Budget	Performs a continuous evaluation of the training staff. Indicates the number of training sessions per year.	YES	YES	IP	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	
	Performs an assessment on the budget to confirm it is enough. Indicates whether or not there is an increase from the evaluation.	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	NSOC	YES	YES	YES	

- **YES:** If the information requested is found and the document approval sent or if the requested information is in the process of implementation, provided that the draft is attached.
- **NO:** If the institution does not have the requested information.
- **PARTIAL (IP):** If the institution sends incomplete information.
- **NOT APPLICABLE (NCOR):** If the information sent is something other than requested.
- **NOT RESPONDING (NRSP):** If there is no response from the institution to the requested information. This course is framed on the assumption that the institution has replied to other requirements.
- **NOT ANSWERED (NSOC):** If after the legal withdrawal and further awarded for this work, not any response of the institution is obtained.

Prepared by: Gamboa y Vargas.



Photo: Mario Zúñiga / DAR

- Perupetro is one of the public-private companies which has most improved regarding the provision of information on its functions, procedures and processes. In addition, it has implemented an assessment survey that provides information on its website as a mechanism for the assessment of their services. These improvements allow a sector of the national population to count on reliable information. However, we must continue to work to disseminate more information with an intercultural approach, in the field where it develops most of its work, i.e. in Amazon areas and among the continental shelf.
- MINAM and MINAGRI are the two institutions at the national level that are making the greatest efforts to promote transparency and the right of access to public information, through regulatory compliance and implementation of initiatives that may be replicable among other entities. For example, MINAM has a system of access to public information - Virtual SAIP, where the user can access the requests for access to information and statistics via the website. In the case of MINAGRI, it is the only institution at the national level that has implemented a transparency and access to information office with staff devoted exclusively to these tasks.
- In relation to the 2013, during the 2014 MINEM and OSINERGMIN have improved their practices on transparency and access to information. There is evidence of willingness from public officials to implement mechanisms to improve attention services for citizens.
- Institutions such as ANA, MINCU and SERNANP still have periods of deficiencies in the implementation of transparency and access to information mechanisms. In the case of ANA, it is an entity that, for the fourth consecutive period has shown low performance in the public information according to the Standard Transparency Portal. This entity, along with the Regional Government of Cusco, are the two entities that have had difficulty for several successive periods in providing information through access to information, so it is important to strengthen their capacities.
- It is important to note that MEF, ELECTROPERU, PETROPERU, PERUPETRO, PROINVERSION and SERNANP did not offer information about their improvements, the implementation of their policies and mechanisms for transparency and access to information, unlike in 2013, when we conducted the first diagnosis. INGEMMET, the new institution evaluated for the second quarter 2014, did not provide us with information either.



Photo: José Serra

Regarding the processes for granting rights for hydrocarbon extraction and hydroelectric plants:

- There is a need for greater intersectoral and intergovernmental coordination, the implementation of efficient mechanisms for accountability towards the general public and the increase in citizen participation in the processes for granting rights for hydrocarbon extraction and hydroelectric plants. In this manner, the citizenship would have more confidence in these processes and there would be a closer relationship with the population in order to avoid social conflicts.
- There is much systematic information published in the websites of the relevant entities, but still greater efforts are needed to ensure that it is culturally comprehensible for vulnerable populations.
- In the case of initial consultation processes for hydrocarbon extraction, there is still a need to improve processes, especially having staff with increased capabilities to supervise the materials that are prepared for the purpose of containing the appropriate standards with an intercultural approach, to avoid the process becoming only a mechanism for validation of documents. In this manner, the Ministry of Culture, as an entity for guaranteeing the rights of indigenous peoples, would have to validate that the information provided is correct.
- In the case of the hydroelectric power sector, no prior consultation process has taken place; however, field work has shown that officials ignore how to perform the process and what it implies, therefore, they are in need of external actors for the identification of indigenous peoples. In this regard, the channels of coordination with the MINCU are not yet adequate.

Regarding the evaluation processes of the Environmental Impact Assessments for hydrocarbons and hydroelectricity:

- There is a need for greater intersectoral coordination and intergovernmental mechanisms for accountability towards the citizenship and greater participation from the population. In addition, we need to increase the implementation of transparency and access to public information, given that not all of the documents generated in the files of the EIA are published on the website of the competent entity or updated in a timely manner. Moreover, it is possible to move through the website, to the documents generated in participatory workshops and public hearings. On the other hand, it is not possible to access the documents produced in the processes of environmental monitoring and control performed by OEFA.

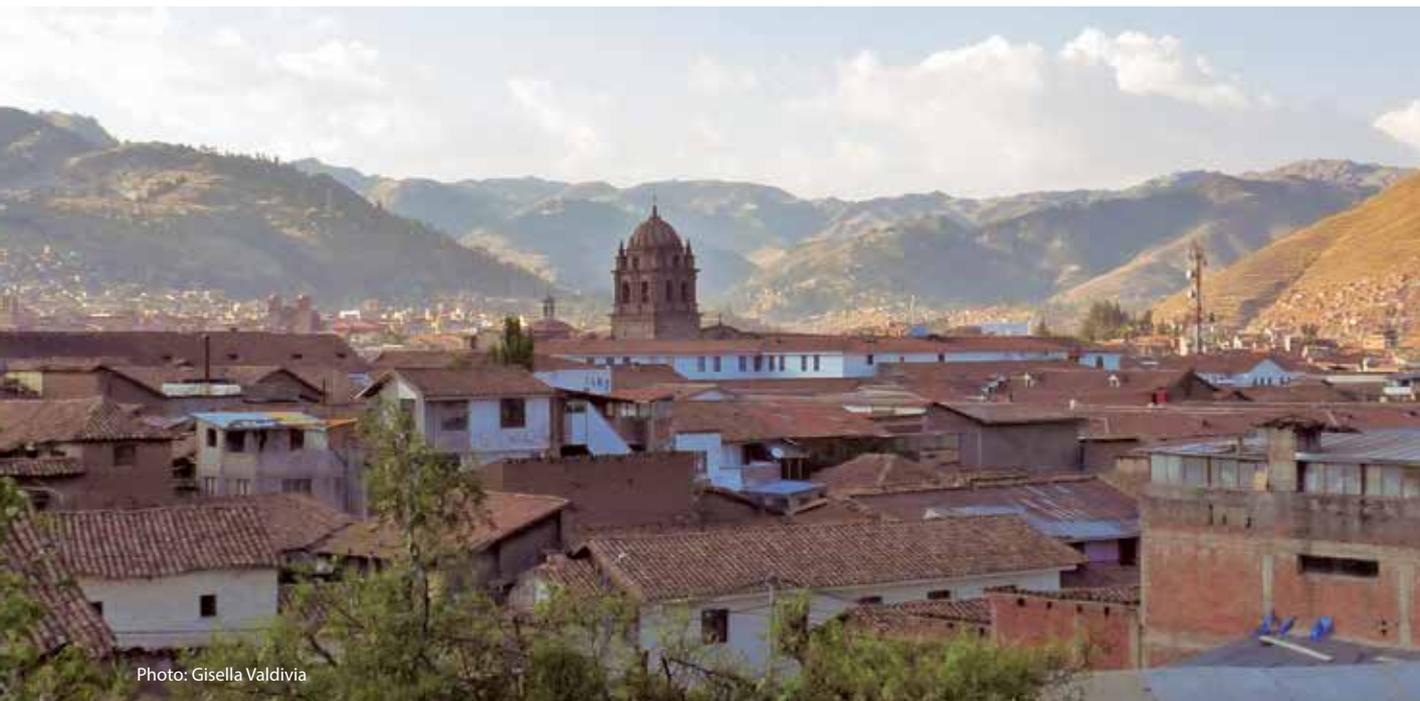


Photo: Gisella Valdivia

- Through the study of the Camisea case (Block 88), it has been verified that the processes of citizen participation are conducted under the classical dynamics of exposure without an intercultural approach. In addition, it has been found that there is a mechanism for mediation or assessment on the understanding of the population with regard to the project and its impacts, or verification by the authority, on the material handed over to the population to make sure they contain the appropriate information. In addition, the recordings of the workshops delivered to the authority on the part of the company does not fully show the development of the process, nor are there mechanisms to ensure the participation of other State institutions that may be the guarantors of a process of inclusive citizen participation.
- In the case of the assessment processes of EIA in hydroelectric plants, through the case study, Chadin II, it has been found that the claims of the population and of the same regional governments and national entities, are not taken into account within the evaluation process of the EIA, therefore are not considered part of the administrative process. In this manner, the process is seen as a formality, not as a process that can actually include the views of the villagers.

Regarding the management of the Loreto and Cusco Regional Governments:

- The regional governments of Loreto and Cusco are largely detached from national-level processes directed by the PCM on transparency and access to public information. In addition, officials do not yet know how to implement transparency mechanisms and strengthen the mechanisms for access to information in the regions.
- The regional governments of Loreto and Cusco requested greater inclusion in the processes for granting rights and environmental assessment in hydrocarbons and hydroelectric plants, as well as strengthening of institutional capacity and governance. In addition, they have confined spaces of planning, with little skills in environmental issues and energy, without sufficient human resources, with few mechanisms for coordination, without a proper participation of the population and public integration which will allow them to perform their functions efficiently.



Photo: Mario Zúñiga / DAR

5. RECOMMENDATIONS

- It is necessary to create a National Authority on Transparency and Access to Information, in order to enable it to have incidence in all sectors and levels of government, directing the policy of transparency, checking the compliance of deadlines and issuing sanctions, homogenizing procedures for the attention of access to information requests, directing the training of officials, checking the compliance of functions and expertise of the staff.
- It is necessary for the PCM to adopt the Action Plan for 2014-2016 Peru Open Government, since it has various objectives which must be met by all sectors and levels of government, in order to implement the commitments that the Peruvian State has taken with the Open Government Partnership, seeking to consolidate a transparent and corruption-free State.
- It is essential to continue promoting the EITI initiative and the Partnership for Transparency of the G8 at national and regional levels, as there will be arrangements for access to important information on the extractive industries, which can be used to generate greater confidence toward the authorities from the population. In this manner, more regional governments would have to implement the EITI Initiative and generate a link with the population.
- It is necessary for the Peruvian State to promote the training of the citizenship and vulnerable populations on transparency and the right to access public information, as well as on international initiatives of transparency and their commitments, which have been implemented in the country, in order to promote a democratic State. The adoption of national legislation that restricts the right of access to information on the environmental assessment process and in topics related to investment projects should be avoided, as it will only increase social conflicts.



Photo: DAR

- To comply with the provisions in the Law of Transparency and Access to Public Information, it is necessary to: (i) to modify and implement a model of standard transparency portal that is friendlier to citizens and (ii) the internal verification, by the State of the compliance with deadlines, with their respective penalties.
- It is necessary for the entities to conform to the new rules of transparency and access to the information approved in June 2013, which establishes the simplification of attention for citizens and no mandatory use of forms to request access to information in order to improve the attention provided to demanding indigenous peoples and rural populations.
- It is important to implement alternative mechanisms for vulnerable populations, minimizing the barriers of distance and accessibility to information by these users.
- Public entities must allocate a specific budget for the area of transparency and access to public information in order to improve the service and comply with the Law of Transparency and Access to Public Information. Also, we recommend the establishment of a specialized office that integrates the transparency and the attention to access of information, in order to better respond to the needs of citizens.
- It is necessary for public entities to share and standardize the processes of processing requests for access to information in virtual and physical form, as well as computer security systems and monitoring of their processes of access to information.
- It is necessary to increase the number of professionals specialized in transparency and access to information, in order for these functions to be performed properly and not be residual functions or ancillary within the institution. At the same time, it is necessary to increase the number of training of the personnel on transparency and access to information.
- It is necessary for the information on the planning of hydrocarbons blocks and the areas to be given in concession to hydroelectric dams to be accessible, intercultural, virtual or physical, but to allow proper access to information for the population who live in the areas where the investment projects will be developed.

It is necessary to improve the implementation of the initial consultation processes in hydrocarbons, through verification of the material handed over and the same process, so that they are adequate and interculturallly sensitive, not only serving as a process of document validation.



Photo: DAR

- It is important to develop procedures to enable people to influence decision-making prior to the adoption of the hydrocarbon blocks or hydroelectric dams to be tendered, and the basis for public tenders.
- It is important to generate more coordination channels between MINAM, MINCU, PERUPETRO, and the Directorate General of Hydrocarbons for MINEM, OSINERGMIN, PROINVERSION and the regional governments, for the granting of rights in hydrocarbons. In this manner, integrating the national entities and regional governments in these processes would ensure better dialogue between both levels of government and the appropriate management of natural resources.
- It is necessary to improve the implementation of the initial consultation processes in hydrocarbons, through verification of the material handed over and the same process, so that they are adequate and interculturally sensitive, not only serving as a process of document validation. In this regard, it is necessary for the MINCU to monitor the development standards of consultation processes, as well as the materials delivered.
- It is necessary to have plans of contextual and intercultural information adapted to areas where there are indigenous peoples and rural population on the tenders in hydrocarbons, as well as the possibility that these populations are able to access more information during the bidding processes that PERUPETRO performs.
- There is a need to develop internal procedures so that the population likely to be impacted by hydrocarbon activities can participate in the development of the concession contracts, so as to influence decision-making and is relevant in environmental and social aspects.
- There is a need to systematize the information generated during the process for granting rights in hydroelectric plants. There is valuable information generated by different entities that is not public, such as the information generated by the Committee on Economic Co-operation of the National Interconnected System (COES - SINAC) that is sent to MINEM, but that is not published on the MINEM's website.
- There is a need for training of officials in the area for granting rights in hydroelectric installations on the topics of prior consultation and citizen participation, so as to better understand the process, the stages and the methodology, because in the future they will be responsible for carrying out procedures to prevent the recruitment of external actors to these functions. This requires greater rapprochement and coordination with MINCU.
- There is a need to develop internal procedures or guidelines that will ensure the certification of processes of citizen participation and the materials delivered in processes of the evaluations of the EIA in hydrocarbons and hydroelectric plants, for which these really serve as mechanisms that influence in the decision-making prior to the approval of the EIA and for which the materials have with standards which are culturally appropriate.



Photo: Mario Zúñiga / DAR

- It is important to create coordination spaces with institutions, such as the Deputy Ministry of Interculturalism in MINCU, in the participation processes for EIA evaluations in areas with indigenous populations, in order for these processes to meet adequate intercultural standards. In this manner, the increase and publicity of coordination levels among competent institutions offering technical opinions to the EIA is of vital importance in areas where environmental and social impacts will take place, as well as in areas with hydrocarbon blocks and hydroelectric plants.
- It will be necessary to strengthen the spaces of transparency in the citizen participation and accountability in the processes of evaluation of the EIA, due to the fact that not all information generated in the informative workshops and public hearings is accessible through the portal of the competent entity. In this manner, it is important to publish web portals in the documents, records and other documents generated in the participatory workshops and public hearings. Similarly, it is necessary to ensure the accessibility of the citizen to the systems of documentary procedure for which this could have a better access to the registry of the files.
- It is necessary to promote spaces of intersectoral and intergovernmental coordination in order to take into account the assessment processes of EIA; the views of each sector in each level of government, as well as from the civil society and the people involved, with the order that they may not be considered only as administrative processes, and the inclusion of a larger number of entities, which will illustrate that there are spaces for dialogue with greater legitimacy, and certification to the processes of citizen participation, with its own citizens trusting State institutions.
- It is necessary that all the information generated in the processes of monitoring by OEFA be accessible to the public, not only the public reports produced by the entity, unless an administrative penalty is underway. This information is of great importance, especially for the people that live in areas with large investment projects.
- It is important that all entities being evaluated in the present diagnosis publish the control actions, reports and audits carried out by the Comptroller General of the Republic regarding its resources and functions, to ensure mechanisms of accountability and transparency, and the citizenry can exercise the monitoring of public service.
- It is necessary to promote transparency and strengthen mechanisms for access to information in the regions. Similarly, it is essential to strengthen the Regional Governments in the principles of good governance, especially in the processes of institutional planning, energy and the environment, in the development of skills and human resources, in the implementation of mechanisms for coordination, in the creation of more opportunities for citizen participation and public integration. All this in order to achieve good governance at the regional level and that the staff members carry out their functions efficiently in energy and environmental issues.



Photo: Mario Zúñiga / DAR

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