

Illegal gold mining in Central Africa

May 2021

ANALYTICAL REPORT



This project is funded
by the European Union

This analytical report was compiled in the framework of the European Union (EU) funded Project ENACT (Enhancing Africa's response to transnational organized crime). The contents of this INTERPOL report can in no way be taken to reflect the views of the EU or the ENACT partnership.

ENACT is implemented by the Institute for Security Studies and INTERPOL,
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Executive Summary

Over the last decade, criminal actors engaged in illegal mining have made huge amounts of illicit profits at the expense of countries' economies, vulnerable populations, and the environment across the Central African region. In the region, gold is mainly produced by artisanal and small-scale gold miners and semi-mechanized companies. The exact quantities of gold produced is unknown to authorities; gold smuggling within and out of the region is well organized, systematic, and concerns the majority of gold leaving the region.

The dominance of crime in the industry is enabled by a variety of factors affecting the entire gold supply chain. Illegal financing, by gold, cash, or other means, fuels the process. Fraudulent practices are a central aspect in land exploitation, and allow criminals to employ more effective methods for extraction and production, and to conceal the real quantity of gold produced.

A network of illegal buyers collects gold from production sites and smuggles it to regional traders and refiners, who, in turn, are likely to obscure its real origin, ownership, and quantity. Gold is then smuggled out of the country or region mainly by air, often via Cameroon or Uganda, towards Asia (United Arab Emirates, India, and China). Smuggling gold to neighbouring countries allow criminals to benefit from discrepancies in export taxes. It also allows them to introduce gold onto the global market masking its origin, especially if originating from conflict zones.

Information suggests that gold mining is largely controlled by criminal consortia composed of different actors, who, collectively, benefit from criminal synergies: members of organized crimes groups (OCGs) and /or corrupt officials in high-ranking positions, economic players, and non-state armed groups in conflict zones. The presence of non-state armed groups in gold mining areas, who seek to finance their activities with the illicit proceeds from this natural resource, is likely to be controlled by some OCGs, as instability facilitates illegal mining operations and lowers buying prices.

Grand and petty corruption respectively protect and facilitate the whole illegal mining process, further weakening already limited law enforcement structures in the region. Moreover, illegal mining forms the basis for the development of associated crimes such as financial crimes, wildlife trafficking, pollution crimes or human trafficking, from which the same or other OCGs might generate even greater profits.

In the absence of mitigating measures, the ongoing development of the gold sector, attracting more artisanal and small-scale gold mining (ASGM) workers and foreign companies with new techniques and equipment, resulting in more production, is likely to reinforce the criminal consortia operating in the region. Finally, it is likely that the OCGs operating in the region benefited from the recent COVID-19 crisis by buying and stockpiling gold at lower prices at production sites and, subsequently, introducing it at higher prices on the global market.

Key Findings

The following are the key findings of this report resulting from an analysis of a range of available data sources on illegal gold mining in Central Africa:

- ❖ Artisanal and small-scale gold mining (ASGM), which supplies the gold industry in Central Africa, is mainly illegal. This illegal economy is attracting an increasing number of laborers, who sustain the workforce for OCGs and represents a potential factor of instability in Central Africa.
- ❖ OCGs, including corrupt high ranking political, military, and economic actors, as well as non-state armed groups, based inside and outside the region, operate along the supply chain, work in synergy to facilitate illegal gold mining activity.
- ❖ Some semi-mechanized mining companies, suspected of corruption, fraud, and environmental crimes generate social tensions and potentially inject more gold in the illegal supply chain at the expense of countries' economies.
- ❖ Most gold in the region is illegally produced, concealed from authorities, and smuggled out of the countries. The lack of monitoring and reliable statistics prevent countries from having a clear picture of the phenomena and facilitate the exploitation of the sector by OCGs.
- ❖ OCGs organize gold smuggling within and beyond Central Africa, relying on fraud to conceal provenance and corruption. They benefit from weak law enforcement, disparate export rates in the region, and they control illegal gold flows thanks to their superior purchasing power.
- ❖ Gold is smuggled across borders in the region via land and air routes. Gold is often smuggled out of the region in hand-carried luggage via commercial airlines, thanks to corruption and low screening capacities in regional airports.
- ❖ Gold from the Central African Republic (CAR) is mainly smuggled to Cameroon. Gold from the Democratic Republic of the Congo (DRC) is mainly smuggled towards East Africa, mainly to Uganda, Rwanda, and Burundi. From these transit countries, gold is mainly exported or smuggled towards the United Arab Emirates (UAE), and to Europe and Asia as final destinations.
- ❖ Non-state armed groups in the DRC and CAR finance their activities by controlling some gold mining sites and smuggling routes, as well as using extortion through illegal taxation.

However, the major part of illicit profits generated goes to OCGs. Such OCGs benefit from the presence of non-state armed groups, as they facilitates illicit gold mining by generating insecurity and inducing lower buying prices on sites.

- ❖ OCGs use various forms of frauds to exploit illegal gold and maximize profits. For example, they illegally partner with foreign companies, abuse or corrupt public administration to obtain authorizations, they under declare or dissimulate gold production to evade taxes. Involvement of elites is likely to permit protection in case of law enforcement control.
- ❖ Illegal gold mining has severe long-term environmental impacts, whether from mercury or cyanide pollution, or destruction of natural flora and fauna. The development of semi-mechanized exploitation has a negative impact on rural habitat and livelihood, destroying arable land and rivers. It can also encourage poaching and logging.
- ❖ Gold allows OCGs to launder illicit profits and has inherent features sought by criminals: high and predictable value, easy to smuggle, can be used as a currency or in gold-for-goods swaps, can be traded almost anonymously. It generates cash which can more easily evade banking controls and law enforcement investigations.
- ❖ Criminal groups involved in illegal gold mining resort to human trafficking and migrant smuggling to maximize their profits, using coercive and violent techniques. Women and children are particularly vulnerable to exploitation.
- ❖ Illegal gold mining can fuel insecurity and the presence of arms on mining sites posing serious security threats to law enforcement.
- ❖ It is likely that the OCGs operating in the region benefited from the recent COVID-19 crisis by buying and stockpiling gold at lower prices at production sites and introducing it at higher prices on the global market. Whilst smuggling by air came to a temporary halt during the pandemic, inland smuggling routes remained active.

Introduction

The Central African region is known for its extensive mineral deposits. Some countries of the region have a huge diversity and abundance of mineral resources, including gold, which is considered under-exploited and for which all deposits have not been uncovered yet.

Over the last decades and until the COVID-19 crisis, the demand for gold has steadily increased worldwide. The price of the commodity reached an unprecedented peak at USD 2,048 per ounce (or 28.35 grams) in August 2020.¹ As a result, it boosted the Central African gold mining industry, with the development of artisanal and more mechanized forms of gold mining activities, which likely benefited economic and social development in the region.

However, the context has also attracted criminal actors who engaged in illegal gold mining, which includes the extraction and the trade of the precious metal. Due to weak law enforcement or lack of regulation, the gold mining sector has become a target for organized crime groups, who generate huge volumes of illicit profits. Moreover, illegal mining is reported to fuel violent conflicts, environmental crime, trafficking in human beings and financial crime.

The development of illegal gold production and smuggling in the region raises questions about the players involved and the drivers enabling the illegal exploitation of the gold supply chain. Therefore, the EU funded ENACT Project has undertaken this assessment on illegal gold mining in Central Africa to better inform law enforcement at a strategic level.

This report is divided into six main parts. The first part presents its scope and objectives as well as the methodology employed. The second part aims at explaining what illegal gold mining is and how it works. The third part examines the estimated gold production and extent of smuggling, and the routes used within and beyond the region. The fourth part of the report is dedicated to OCGs and examines as well the involvement of non-state armed groups in conflict zones. The fifth section will study the crimes associated with illegal gold mining such as fraud, environmental crimes, and trafficking in human beings. Finally, the sixth part will deal with the mitigation measures and the impact of COVID-19 on illegal gold mining in the region.

1. STRUCTURE OF THE REPORT

1.1. Scope and objectives

The objective of this report is to provide a comprehensive assessment of the involvement of organized crime in illegal gold mining in the Central African region, which includes the following countries: Cameroon, the Central African Republic (CAR), Chad, the Republic of Congo, the

Democratic Republic of Congo (DRC), Equatorial Guinea, Gabon, and the Democratic Republic of Sao Tome and Principe.

The assessment draws upon an analysis of available data and presents the current nature, scope, dynamics, and activities of organized crime linked to illegal gold mining in the region. When possible, it also provides an overview of the active groups throughout the region and the type of illegal enterprises, in relation to illegal gold mining, in which they are engaged. This report intends to provide the concerned countries with actionable strategic intelligence to enable them to devise appropriate countering strategies and to be a tool for eliciting law enforcement cooperation among the countries impacted by this crime and among those which are at risk of being affected in the near future.

1.2. Methodology

This assessment follows an all source intelligence analysis methodology. It is the result of integrating multiple data sources.

Open sources used in the framework of this report include news articles and reports from various private entities, international organizations and think tanks. Whenever identified, official statistics and data were used and given preference over other sources.

Information from the aforementioned sources was aggregated together in order to identify consistencies across all data, patterns and trends, and any identifiable convergences.

Following this, the ENACT-INTERPOL team consulted and cooperated with INTERPOL analysts working on specialized crime areas covering illicit gold mining. Information provided by these departments was incorporated into this report where relevant. A regional approach was retained when drafting this report. Therefore, when national examples are quoted, it is done for illustrative purposes, in order to put forward regional dynamics.

2. WHAT IS ILLEGAL GOLD MINING AND HOW IS IT ORGANIZED?

2.1. Definition of concepts

According to the INTERPOL Environment Security Programme, illegal mining is considered as an environmental crime, which is a collective term describing any illegal activity carried out by an entity, mainly to generate financial or material gains, which results in the harm of the ecosystem by damaging environmental quality, driving biodiversity loss or overexploiting natural resources.² A report in which INTERPOL collaborated specified that these illegal activities which may include, “serious and transnational organized crime”, can be carried out by “individuals or groups or companies.”³

Illegal gold mining is not limited to illegal extraction and trade, but similar to other environmental crimes, it includes a specific criminal supply chain, transcontinental trafficking trends, convergences with other serious crimes and the exploitation of legal, structural and societal weaknesses.⁴

There is no universally agreed definition of illegal mining. For the purpose of this study focusing on Central Africa, where legal frameworks for gold mining exist in all concerned member countries, illegal gold mining will be understood as **“all activities related to and actors involved in gold mining, trading, and financing, which do not abide by the laws of the jurisdictions”**.

In a region where gold mining is known to be largely illegal, albeit tolerated, it is important for law enforcement to have a nuanced approach, to set priorities, so as to target the most harmful activities and groups among illegal actors and activities related to gold mining. For instance, between two illegal actors such as artisanal gold miners working for their livelihood without a licence and gold smugglers depriving the state of significant revenue, the enforcement priority would likely best be set on the second actor.

2.2. Legal and institutional frameworks

As far as the institutional framework is concerned, Ministries of mines are in charge of organizing gold production and trade in Central African countries. In an attempt to develop the sector and encourage investment, countries in Central Africa have updated their legal frameworks to organize the gold supply chain better, also introducing measures to protect the environment, workers' health and security, and to ban child labour.⁵

The mining codes, as well as regulations, set the rules for the exploitation of the mineral. They also dictate how exploration and mining licences and lands rights are granted. They also define the different categories of exploitation, usually ranging from artisanal to industrial mining.

These legal frameworks also organize the trading of gold from the production sites to the exporter. Only licensed traders (called “collecteurs” in the CAR) can buy gold from pit managers. Then they have to sell their minerals to official buying houses (called “bureaux d’achat” in the CAR, or “comptoir agréé” in Chad). The official buying houses are allowed to export gold and collect taxes. Some cooperatives are also allowed to export their production. In most countries, this legal supply chain coexists with an illegal supply chain, which attract most of the gold produced, for reasons that will be developed below.

According to some sources, some legislative frameworks suffer from inconsistency or ambiguity (for instance, artisanal mining zones are not specified). Moreover, in some jurisdictions, the

institutions and agencies involved in regulating the sector lack coordination. The legal framework is also likely poorly enforced because of scarce human and financial resources.⁶

2.3. Features of the three main types of gold mining exploitation

In the Central African region, we can distinguish three main types of gold exploitation: artisanal and small scale gold mining (ASGM), large scale or industrial gold mining (LSGM), and a hybrid type combining ASGM features with mechanized tools and equipment, sometime referred to as artisanal semi-mechanized exploitation.

This section will examine the supply chains of each type of exploitation. Supply chains, are composed of three main systems, which are closely embedded: the production system, in charge of extracting gold; the trading system, which permits the sale and exportation of the extracted mineral, and the financing system, which allows the production to take place.

2.3.1. Artisanal and small-scale gold mining

The ASGM sector, a supply chain sector in Central Africa which is mainly illegal, is attracting an increasing number of individuals and constitutes a reserve of workforce for OCGs as well as a potential factor of instability.

There is no internationally agreed definition on artisanal and small-scale gold mining, as it depends on the various national legislations. For instance, in Central Africa, artisanal mining can be defined by the maximum depth of the pit: it is limited to 10 meters in Cameroon by the 2016 mining code. The activity can also be restricted to a dedicated area: in the DRC, artisanal mining is only permitted in artisanal exploitation zones (Zones d'exploitation artisanale) determined by the Ministry of Mines. Finally, it can also be defined by the type of equipment or techniques allowed.

The ASGM sector, a supply chain sector in Central Africa which is mainly illegal, is attracting an increasing number of individuals and constitutes a reserve of workforce for OCGs as well as a potential factor of instability.

According to the Organisation for Economic Cooperation and Development (OECD), ASGM activities can be defined as “formal or informal mining operations with predominantly simplified forms of exploration, extraction, processing, and transportation” and “normally low capital intensive and high labour intensive technology.” It can include “men and women working on an individual basis as well as those working in family groups, in partnership, or as members of cooperatives, or other types of legal associations and enterprises involving hundreds or even thousands of miners.”⁷

ASGM is also characterized by the low-level use of technology, limited use of mechanisation, and low productivity and recovery values. It also generally implies a lack of safety measures and health care, a lack of environmental protection, and it is often informal in nature.⁸

How the ASGM production system is organized?

Gold production at the pit level involves various actors, with their specific role, organized by a pyramidal hierarchy. Miners or diggers usually work for a mine manager, who can be also a landowner. The mine manager can be hired or can have funded the operation. He is also the one who negotiates a right to exploit the land with the traditional authorities, however, he does not necessarily have an official licence.⁹ For instance, in the CAR, out of an estimated 35,000 mine managers, only 2,000 have a licence (5.7 per cent).¹⁰ Gold miners are generally not in possession of the necessary legal documents. For example, in eastern Cameroon, Central African refugees or nationals mostly carry out artisanal mining without the compulsory “carte d’artisan”.¹¹

The ASGM trading system

As previously mentioned, mining codes organize the trading of gold issued from ASGM, but most gold actually circulate down the supply chain via an illegal network of intermediaries. These unregistered local buyers¹² purchase small amounts of gold that they sell to other bigger buyers with a profit margin. They are sometimes independent, but more often work as an agent for bigger unregistered dealers in regional trading hubs. Illegal and legal supply chain actors are in competition, but the two systems are also porous: illegal gold can enter the legal supply chain and vice versa.¹³ Like a ramification of small streams fuelling larger ones, gold finally ends up in regional hubs, to be smuggled out of the countries and finally out of Central Africa.

The ASGM Financing system

The buyers, whether registered or unregistered, can also play the role of financiers or intermediaries between the mining site and distant financiers. The latter can be located in the production country, or in a neighbouring country or even outside the African continent. In several Central African countries, a common financing pattern can be observed: illegal financiers, thanks to their network, inject money in illicit gold mining projects. When the mining site is producing gold, the financier or its representatives, buy the production at an agreed price. Controlling the

buying price allows them to secure the gold flow and to maximise returns on investment. For instance, some financiers, many of them Muslim Central African nationals having fled the 2013-2014 crisis and settled at the Cameroonian border city of Garoua-Boulay, hire and send representatives in the CAR to finance the development of mining sites and collect the gold production.¹⁴

A booming ASGM sector in Central Africa?

According to the UN, 15 million people work in the ASGM sector globally, including 4.5 million women and over 600,000 children. The ASGM sector accounts for 20 per cent of the annual gold production. ASGM is a development opportunity and livelihood for rural populations. In many countries, miners operate on the brink of legality where ASGM is limited by legislation and licensing procedures.¹⁵

Artisanal gold mining, which is a traditional activity in most Central African countries, has been experiencing a boom due to various factors. The rise in the price of gold, allowing for higher remuneration, has made this activity more attractive. Open sources mention regular gold rushes in the region. In Chad, the discovery of gold in the Baatha central region led to an important gold rush.¹⁶ A 2016 report estimated that 100,000 individuals were directly working in the ASGM sector in Chad with 600,000 individuals depending on them for their livelihood.¹⁷

Gold rushes usually lead to illegal gold mining and to an increase in banditry and sometimes instability. For instance, in the southern Chadian province of Guera, where illegal gold mining activities recently developed, authorities reported an increase in cases of robbery, theft of vehicles and extortion of property."¹⁸ In 2018, after a gold rush in the gold mining area of the Tibesti region in the North of Chad, tensions over the control of gold started between the state, gold miners and the local Teda population, traditionally active in gold mining in the region and eventually led to combat between the Chadian army, local and foreign miners, rebel groups, armed gangs which came from Libya and Sudan, as well as a so-called autodefense committee of Teda population.¹⁹ In October 2020, the government forbade the illegal exploitation of gold in the country.²⁰

The development of ASGM has been amplified by some geopolitical factors. For instance, since the 2013 crisis in the CAR, many miners have moved from diamond to gold mining, which was traditionally operated by women and children.²¹ The number of workers on gold sites in the CAR is estimated between 31,540 and 41,000 individuals.²²

In the DRC, the number of gold miners has been increasing for the past 10 years: a shift from the 3Ts (Tin, tantalum and tungsten) to the gold sector can be explained by the collapse of international prices and the formalization requirements in the 3T sector. In 2019, a study by the International Peace Information Service (IPIS) counted at least 274,000 gold diggers in eastern DRC, where gold is the most important mineral mined in the ASM sector, employing 80 per cent

of artisanal miners.²³ The availability of this important workforce, vulnerable but motivated by the profitability of the mineral, is exploited by OCGs.

2.3.2. Artisanal semi-mechanized: hybrid exploitation by foreign companies

The establishment of foreign semi-mechanized companies, suspected of corruption and fraud, often generates social tensions and potentially injects more gold in the illegal supply chain. In several Central African countries, there is an increased presence of foreign and national mining companies, using a higher level of mechanization and technology. Such companies, sometimes referred to as artisanal semi-mechanized or semi-industrial, permit better gold output but also increase environmental and social damages (as discussed below). In some countries, the use of equipment is limited by law: for instance, in Cameroon, semi-mechanized artisanal exploitation is limited to one loader, three excavators and a wash plant.

What is known about these entities?

Little information is available about these companies operating in Central Africa. In Cameroon, 115 operating gold mining companies were listed in the 2017 Extractive Industries Transparency Initiative (EITI) report.²⁴ According to open sources, 95 per cent of them are of foreign-owned²⁵ and come predominantly from China, but also from South Korea, Greece, and South Africa.²⁶ According to the 2018 EITI report for Chad, 11 gold mining companies were active in Chad with valid authorization for semi-industrial exploitation.²⁷

In Central Africa, partnerships between local public and private companies or cooperatives, with foreign companies are common and encouraged by authorities. For instance, in Gabon, the public companies Société Equatoriale des Mines, signed a partnership with Chinese mining companies.²⁸ An IPIS report noted the “lack of clarity” of the operations of such companies in the CAR. It added that the “apparent arrival of Chinese industrial miners in the country since late 2015”, whose presence appeared “illegal and benefiting only a few top-ranking officials”, has generated “confusion, suspicion and [...] tension”.²⁹ Such assessments could apply to other countries in the region.

Trading system

Little information is available on the gold production and exports of semi-mechanized companies. It is hence difficult to know the quantity of gold produced and how it is exported. In some countries, these companies have the possibility to export their production. For instance, in Cameroon, the 2016 mining code implemented a 25 per cent tax on gold produced by semi-mechanized companies, which can then export the remaining part with an authorization.³⁰

In Chad, a semi-industrial mining company can “use transport and freely commercialise on the national territory” to extract gold. Similarly, in CAR, companies with an artisanal semi-mechanized licence are allowed to sale and export their production. However, only a few of them have ever

submitted their gold production for export through official channels and their production is likely to be smuggled to eastern Cameroon.³¹ In the DRC, officials of the assistance and supervision service for artisanal and small-scale mining (Service d'assistance et d'encadrement de l'exploitation minière artisanale et a petite echelle; SAEMAPE) said they faced challenges documenting gold production where cooperatives signed agreements with semi-industrial dredging companies because, in these cases, gold production often goes unrecorded.³²

2.3.3. Industrial or large scale gold mining (LSGM)

LSGM are usually multinational companies, using advanced technology and employing qualified mining personnel. As large-scale mining operations imply high investments, LSGM usually tends to seek political stability and well established and enforced mining legislation.³³ There are some projects of LSGM in Central Africa,³⁴ but currently, the DRC is the only country with a producing LSGM sector, comprising 18 active companies.³⁵ The leading companies in this sector are Canadian (Kilo Goldmines, Banro Corporation), South African (AngloGold Ashanti), United Kingdom (Randgold Resources), followed by other Mauritian, Australian, Chinese and Congolese actors.³⁶ The DRC's LSGM production is reportedly officially exported, however no information is available on its final destination.

3. ILLEGAL GOLD FLOWS

3.1. Localisation of Central African gold deposits

The Central African region's soil is rich in gold deposits and many are not exploited or discovered yet. In Cameroon, the main gold deposits are located in the northern part of the east region (Bétaré Oya, Ngoura, Garoua Boulai, Batouri, Béké and Ndélélé) and in the Adamawa region (Meiganga).³⁷ According to the Ministry of Mines, only 40 per cent of the mining potential of the country is known.³⁸

In the CAR, gold is mined in 14 out of 16 provinces, notably within the Southern Prefectures of Basse-Kotto, Ouaka, Mbomou, and in the Western prefectures of Mambere-Kadei, Nana-Mambere near the border with Cameroon.³⁹ Gold mining in Chad is essentially artisanal and located in the north of the country in the Tibesti region, and in the West Mayo-Kebbi region.

The DRC has rich gold deposits. The four main gold geological regions are, from most to least exploited: the "Kibaran Gold Province", overlapping North Kivu, South Kivu and the eastern part of Maniema; the Kilo-Moto area ("Northern Gold Province") located in Ituri and Haut-Uélé provinces; the "Panafrikan Gold Province" located along the eastern border of South Kivu and finally, the "Lubero Gold Province", located near Lake Edwards in North Kivu overlapping the Ugandan border.⁴⁰ The DRC is among the global ten top ASGM producers and it is estimated that USD 28 billion worth of gold lies in the eastern part of the Democratic Republic of Congo.⁴¹

Official statistics on production and export are scarce, or not significant. There are important discrepancies between official figures of production and estimates. Moreover, the export figures do not correspond to the quantities of gold leaving the region, as shown by official trade figures. These discrepancies indicate that most gold is illegally produced, concealed to authorities, and smuggled out of the countries.

In Gabon, gold is produced in the South (Ogooué Lolo and Ngounié Provinces), North East (Ogooué Ivindo Province), and North (Woleu Ntem Province) of the country.⁴² National deposits are estimated at 40 tons.⁴³ In Congo, gold is mined in the following regions: Bouenza, Cuvette Ouest, Kouilou, Niari, Pool and Sangha.⁴⁴ In Equatorial Guinea, gold exploitation takes place in the following locations: Aconibe, Coro, and Mongomo.⁴⁵ There is reportedly no gold mining activity in Sao Tome and Principe.⁴⁶

3.2. Estimated gold production and scale of smuggling

Official statistics on production and export are scarce, or not significant. There are important discrepancies between official figures of production and estimates. Moreover, the export figures do not correspond to the quantities of gold leaving the region, as shown by official trade figures. These discrepancies indicate that most gold is illegally produced, concealed to authorities, and smuggled out of the countries. This opacity is preventing the countries in the region from having a clear picture of the phenomena and facilitates the exploitation of the sector by OCGs.

Cameroon - According to the EITI, Cameroon's official artisanal gold production, that is to say collected via the legal supply chain, amounted for 701 kg in 2017.⁴⁷ The U.S. Geological Survey (USGS), a government scientific agency of the United States, estimated Cameroon's annual capacity of artisanal gold production at 2,000 kg for 2017.⁴⁸ The EITI report underlines that all gold produced comes from the ASGM sector and that "informal production is preponderant" and is not taken into account as no data is available about it.⁴⁹ Considering information suggesting that only 5⁵⁰ to 10⁵¹ per cent of gold is channeled through the legal supply chain, the total gold production in 2017 would range from approximately 7 to 14 tonnes.

In 2017, official gold exports amounted in 29.7 kg.⁵² EITI noted that "the lack of information on exports by semi-

mechanized small-scale miners is a concern given the significant public attention on this issue, particularly by host communities and civil society.”⁵³

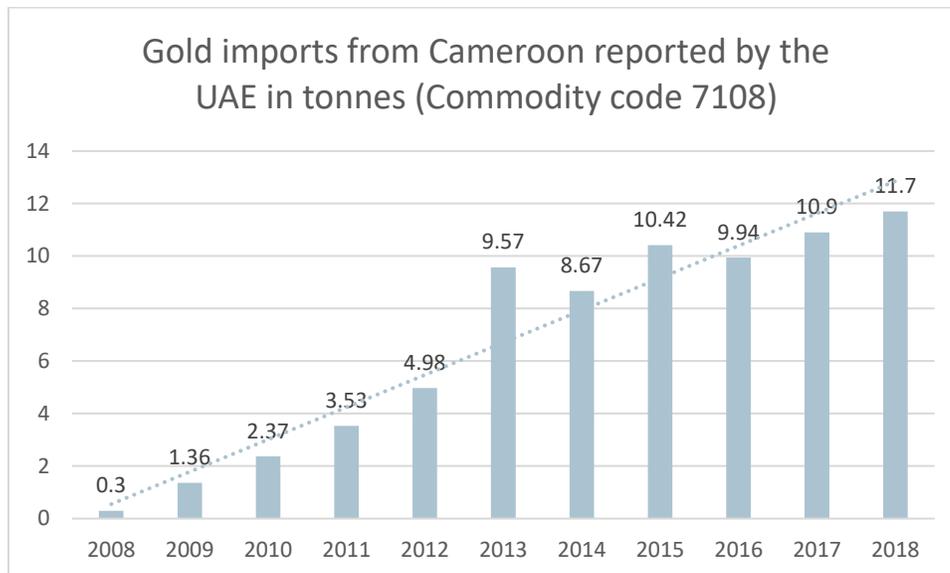


Figure 1: Evolution of gold imports from Cameroon reported by the UAE from 2008 to 2018.

According to the United Nations International Trade Statistics Database (Comtrade Database), the United Arab Emirates is the main importer of gold from Cameroon. Over ten years, from 2008 to 2018, UAE imports from Cameroon increased from 0.3 to 11.7 tonnes. Over the 2008 to 2017 period, the comparison between Cameroon’s declaration of annual exports to the UAE and UAE’s declaration from Cameroon show important discrepancies. Indeed, annual export figures to the UAE declared by Cameroon never exceeded 32 kg.

In 2017, the last available figure of export to the UAE reported by Cameroon was only 4 kg, whereas the UAE declared having imported 10.9 tons of gold from Cameroon.⁵⁴ Assuming all gold did in fact originate in Cameroon, this figure would indicate that most Cameroonian gold production was smuggled from Cameroon to the UAE in 2017. Alternatively, if we consider that Cameroon produced 7 tons of gold in 2017 (low estimate), it would suggest that foreign gold entered Cameroon to be exported as Cameroonian gold, and that Cameroon would be a transit country for gold originating from other countries of the region.

CAR - A recent field study by IPIS showed an increase in estimated annual ASGM production from 1.98 tonnes in 2018 to of 5.66 tonnes in 2019. The same source estimated that 97.5 per cent of gold production is not officially registered and smuggled out of the country.⁵⁵ According to the

Central African Ministry of Mines, official gold production for export in 2018 amounted to a little under 142 kg only.⁵⁶

Chad - The USGS estimated the annual gold production capacity of Chad to be approximately 150 kg, originating from the Mayo Dallah.⁵⁷ No official data is available regarding gold production or export. According to the UN Comtrade Database, the United Arab Emirates is the main importer of gold from Chad and declared having imported an increasing amount of gold, from 2.8 tonnes in 2017 to 6.9 tonnes in 2019.⁵⁸

DRC - A study, based on visits to 1,220 ASGM sites in Eastern DRC between 2013 and 2015, estimated the total annual gold production produced by the ASGM sector at 11.6 tonnes.⁵⁹ The USGS estimated DRC's ASGM annual capacity production to 13 tonnes in 2016.⁶⁰ According to the DRC Ministry of Mines statistics, as a result "of fraud and smuggling," annual official artisanal gold production decreased over the 2014 to 2018 period, from 632 kg to 246 kg.⁶¹ Official artisanal gold exports also decreased: 230 kg were exported in 2017, 56 kg in 2018⁶², and finally only 39 kg in 2019.⁶³

These low and decreasing official artisanal gold production and export figures suggest a high level of concealment and smuggling. It is indeed estimated that 95 to 98 per cent of DRC ASGM production is concealed or smuggled out of the country⁶⁴ mainly towards Uganda, Rwanda, and Burundi.

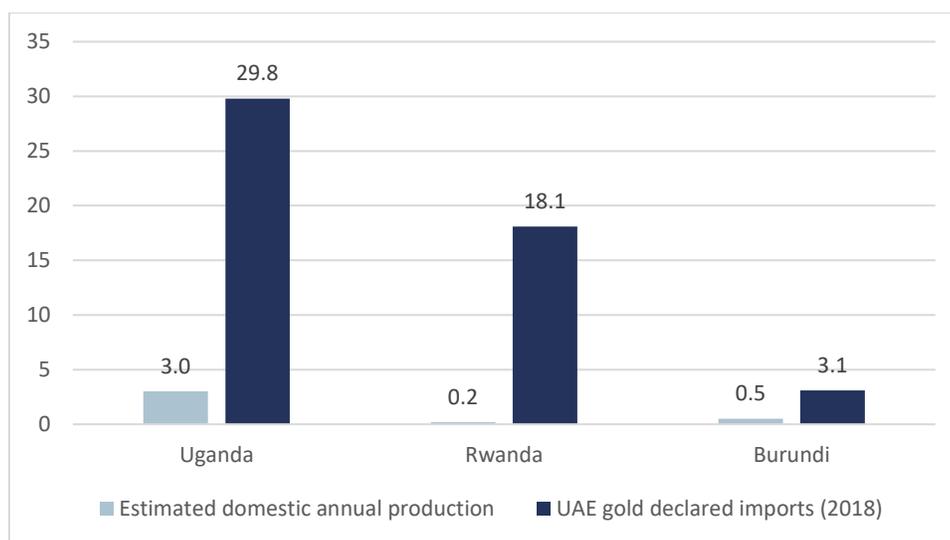


Figure 2: Estimated domestic annual production of gold and UAE gold declared imports

Figure 2,⁶⁵ compares the estimated annual gold production of Uganda, Rwanda, and Burundi to the UAE declared gold imports (in tonnes) from these countries in 2018. The diagram shows that the DRC's neighbouring countries are producing much less gold than what the UAE declared as

import from these countries. For instance, the UAE declared it imported nearly ten times the amount produced by Uganda or more than 90 times the estimated production of Rwanda. The fact that these countries export much more gold than what they can domestically produce corroborates their suspected position as a transit hub for the DRC's gold in the region.

As seen previously, the DRC is the only country in Central Africa with an operating LSGM industry. The latter has experienced a sharp increase in production from 6 tonnes in 2013 to 31 tonnes in 2015.⁶⁶ In 2018, the LSGM's production reached more than 36.5 tonnes, of which 36.1 were officially exported.⁶⁷ However, no official information on the export destination of this LSGM production is available. Looking at the UN Comtrade database for 2018, the sum of quantities declared by countries having imported gold from DRC amounted to 2,173 kg of gold, representing only a small portion of the gold officially exported that year.⁶⁸

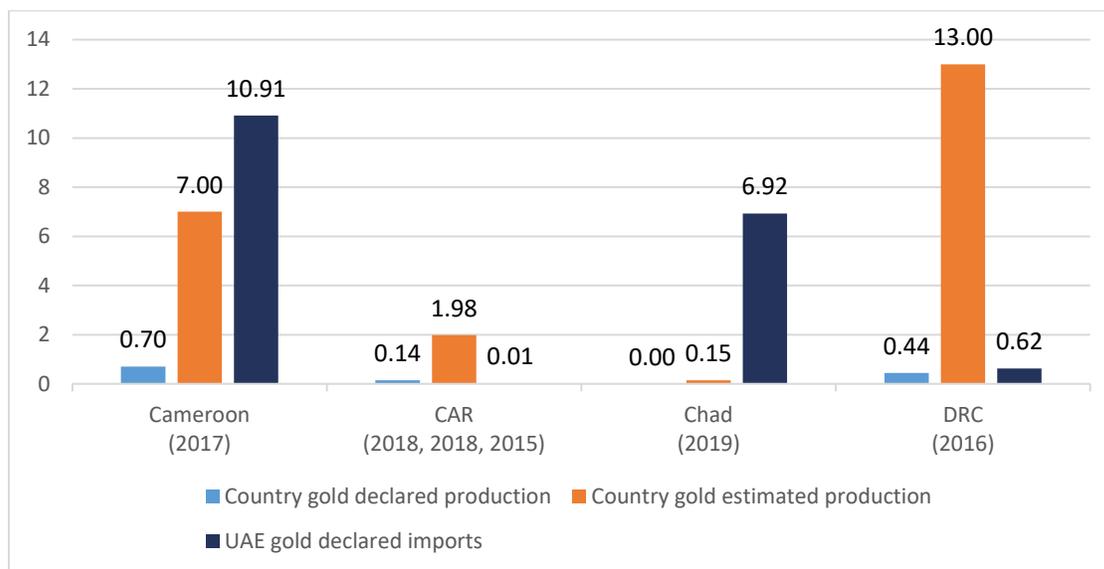


Figure 3: Declared gold production compared to estimated production and UAE declared imports for gold from Cameroon, the CAR, Chad, and the DRC in tonnes. (Except LSGM, there was no data for declared gold production for Chad)

The above figures show the important discrepancies between the declared productions of ASGM gold, the estimated gold production and the official imports from these countries by the UAE. Important imports to the UAE from Cameroon and Chad compared to low domestic production suggest that these countries are likely transit countries for gold coming from neighbouring countries or that their domestic production is concealed or under declared to authorities. Similarly, estimated gold production in the CAR and the DRC compared to weak official domestic productions and exports suggest a high level of concealment and smuggling.

In **Gabon**, ASGM annual capacity production from the Eteke region was estimated between 300 to 700 kg in 2016.⁶⁹ This estimate corroborates the one by the Mines Ministry of Gabon, which evaluated the ASGM sector's monthly production between 25 and 55 kg⁷⁰, i.e. 300 to 660 kg per year. Another source reported two tonnes per year.⁷¹ However, illegal production is likely to be higher since in September 2018, Gabon announced the closing of several gold mining activities, and stated that 4 tonnes of gold were then illegally exported each year.⁷²

In 2018, all official gold production in the **Republic of Congo** came from artisanal mining and amounted for 52.6 kg, of which 45.7 kg were exported to the United Arab Emirates. Over a period from 2012 to 2018, USGS estimated the ASGM's annual production capacity at 150 kg.⁷³

In **Equatorial Guinea**, ASGM annual capacity production was estimated at 500 kg in 2012 in the following locations: Aconibe, Coro, and Mongomo.⁷⁴ In 2020, Equatorial Guinea signed several gold exploration contracts with different foreign companies and promoted industrial mining projects, including a gold refinery.⁷⁵

There is reportedly no gold mining activity in **Sao Tome and Principe**.⁷⁶

3.3. National, regional, and international smuggling routes

Gold from the CAR is mainly smuggled to Cameroon. Gold from the DRC is mainly smuggled towards East Africa, mainly to Uganda, Rwanda, and Burundi. From these transit countries, gold is mainly exported or smuggled towards the UAE, and then to Europe and Asia as final destinations.

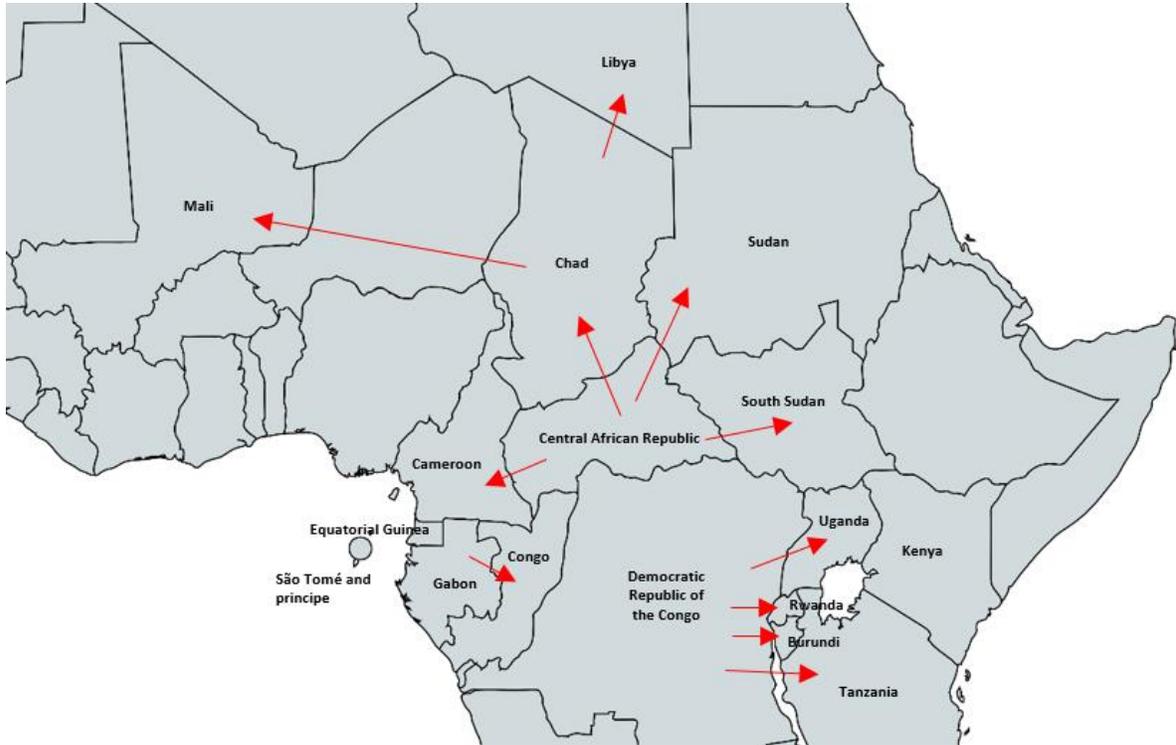


Figure 4: Gold flows across the Central African region and beyond

Cameroon

Cameroon is most likely a source and transit country for gold smuggling. Open sources indicate that gold illegally exits Cameroon by air towards the UAE or China as final destinations, smugglers using airlines companies or private jets.

CAR

The CAR is most probably a source country for gold smuggling. According to reports of the United Nations Panel of Experts for the Central African Republic (PoE), Cameroon is the main destination for gold produced in the west of the CAR. CAR's gold, produced in the eastern part of the country, is mainly smuggled towards Chad, the DRC, Sudan (Nyala) and South Sudan.

Within CAR, Bangui is the main destination for gold: legal buying houses purchase gold from their networks of representatives and from illegal collectors based in production areas. Gold is smuggled by road to Cameroon, mainly to Garoua-Boulai and to a lesser extent to Mbaiboum. Open sources reported that Cameroonian customs in Garoua Boulai recently arrested a Chinese national with 7 kg of gold originating in CAR.⁷⁷ Bangui's airport is also quoted as being a frequent transit point for minerals towards countries in Central Africa.⁷⁸

Chad

Gold is likely moved from Chad's border regions to Ndjamena, and is then exported to the UAE. Links with West and North African exporting countries such as Mali or Libya are also probable.⁷⁹

DRC

In the Great Lakes region, the DRC is almost certainly the main source country: there are strong indications that Uganda, Rwanda, Tanzania, and Burundi are receiving gold from the DRC.⁸⁰

Gold is smuggled from Bukavu to Kigali (Rwanda) to Bujumbura (Burundi), and from Butembo to Kampala (Uganda), via Kasindi at the border.⁸¹ DRC's gold from Bunia, in Ituri, is also smuggled to Kampala.⁸² Kampala most probably remains the main transit hub for gold smuggled out of the DRC.

Cases showed that gold is also reportedly smuggled from Lubumbashi in the DRC to Dubai in the UAE by way of hand-carried gold. Dubai is reportedly the main recipient of artisanal sourced gold from the DRC.⁸³

Gabon

A system of smuggling towards the Republic of Congo and Cameroon existed in the 1990s.⁸⁴ Open sources suggest that gold from Gabon is likely to be exported towards Republic of Congo.

According to searches in World Check, information indicates that gold smuggling activities involving individuals from the DRC, Cameroon, Kenya, France, the US, and China operate primarily in DRC, CAR, Uganda, Kenya and Chad. Some businesses based in the DRC such as gold mining or airline companies appear to be involved in the illicit gold trade.⁸⁵

Dubai and the African gold sector

Sources suggest that Dubai in the UAE is the main destination of African illicit gold trade. According to the UN's Comtrade database's figures, Africa's share of Dubai's gold imports rose to 50 per cent from 16 per cent between 2006 and 2016. Moreover, the UAE is among the 10 biggest sources of investment in Africa, much of it in the mining sector. Trading in gold is important for the UAE as it accounts for about 20 per cent of its economy.⁸⁶

According to the Sentry, Dubai is the destination point for an estimated 95 per cent of gold from East and Central Africa. It is estimated that USD 3 billion in gold originating in these regions. It is then exported mainly to India, China, and Switzerland.⁸⁷ The report noted that it is reportedly easy to import and sell gold in Dubai due to four key risk factors: weak customs controls, inadequate oversight of the gold souk, the continued allowance of large cash transactions, and inadequate oversight of refiners.⁸⁸ Bilateral discussions with source countries and efforts by UAE's main trading platform to meet responsible sourcing set out by the OECD were reported.

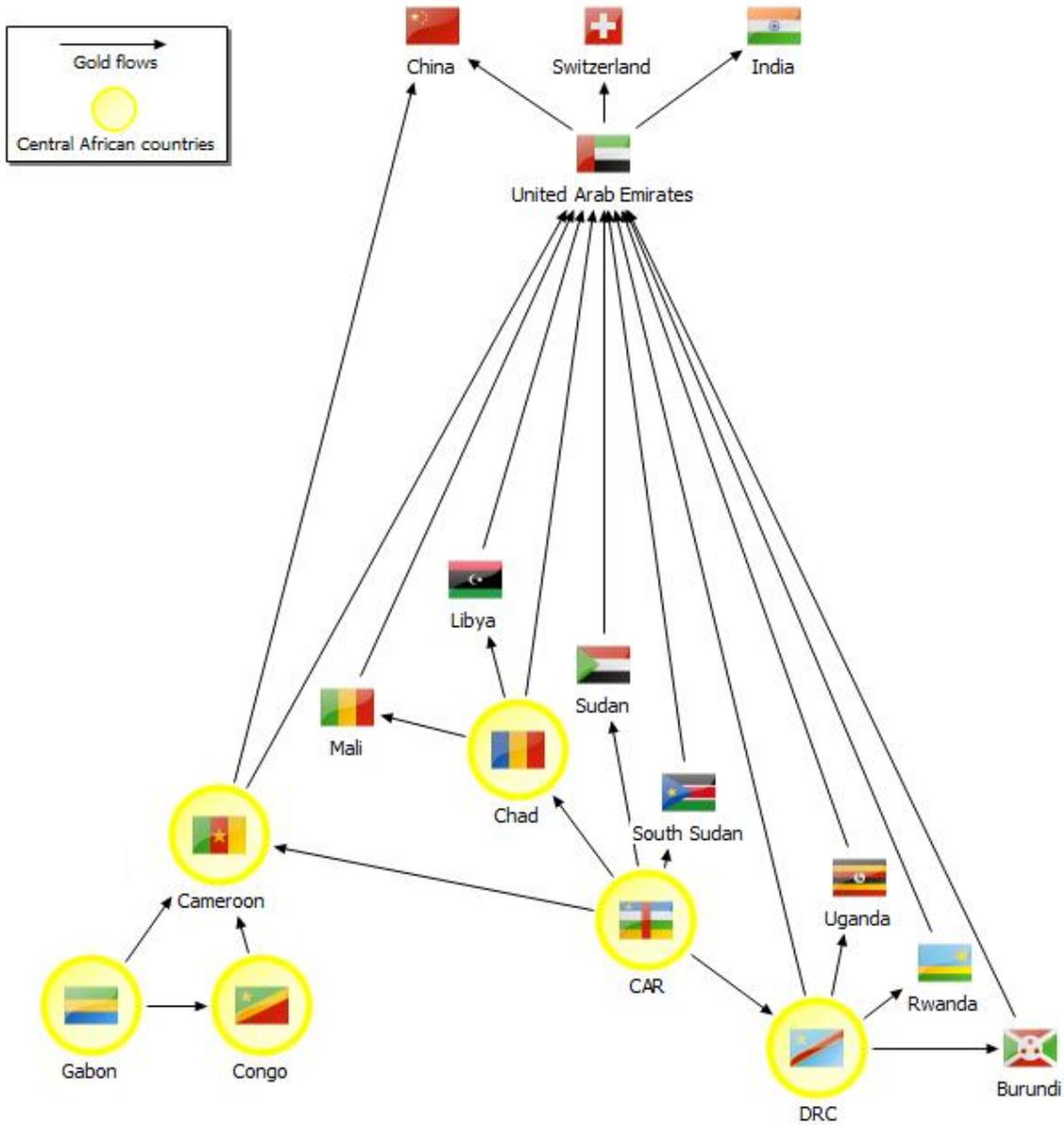


Figure 5: Routes of exports/smuggling of gold from Central Africa

OCGs corrupt law enforcement agents, use fraud to conceal gold origin, facilitated by forged documents or smelting gold. They benefit from weak law enforcement, disparate export rates in the region, and they control illegal gold flows due to their superior purchasing power.

3.4. Gold smuggling's key drivers and facilitators

Several factors enable and foster gold smuggling within Central Africa and towards destination countries. OCGs corrupt law enforcement agents, use fraud to conceal gold origin, facilitated by forged documents or smelting gold. They benefit from weak law enforcement, disparate export rates in the region, and they control illegal gold flows due to their superior purchasing power.

Fraud

Different types of fraud can be used to smuggle gold, including utilizing forged or falsified documents, which modify the origin of gold, or under-declare it. For instance, the UN DRC Group of Experts (GoE) reported the use of fraudulent Congolese export documents to move gold across the Congolese-Ugandan border⁸⁹ or the use of International Conference on the Great Lakes Region (ICGLR) certificates used in a fraudulent manner to export gold to Dubai.⁹⁰

Concealment of gold origin

Smuggling gold to neighbouring countries permits criminals to hide the real origin of the gold, which may be especially important if it comes from conflict zones. In Uganda, “front companies with obscure ownership” collect smuggled gold from the DRC, which can then be exported, labelled as Ugandan gold.⁹¹

Mixing golds to obscure origin

Refining or mixing gold of different origins together is another way to hide the real origin of the smuggled gold or doré.⁹² Open sources suggest that gold is smuggled from the DRC's conflict zones to regional refineries in Uganda and Rwanda and is then “flown to Dubai for re-refining, where it could be mixed with gold from other sources.”⁹³ In 2018, an NGO report suspected a refinery based in Uganda, the African Gold Refinery, of having refined illegally-smuggled conflict gold from eastern DRC.⁹⁴ More recently,

the DRC GoE concluded that “some refineries acted as brokers, used cash payments that evaded tracing, undertook refiner-to-refiner trading that concealed the origin of smuggled gold and used corporate networks, making it difficult to establish beneficial ownership. Most gold trading evaded the formal banking network.”⁹⁵

Central Africa hosts several projects of refineries. Two in the DRC (in Bunia and Bukavu), for which the DRC GoE expressed its concerns: these structures “may face challenges in ascertaining whether gold purchased did not benefit armed groups and criminal networks” considering “the environment of under-declaration, untraceable sourcing and smuggling”. A refinery recently opened in Bangui,⁹⁶ and another one in Cameroon has reportedly admitted not declaring processed gold to customs, in order to avoid paying taxes on metal exports.⁹⁷ Moreover, Dubai-based investors are reportedly financing “a wave of mini-refineries in Africa”, that could further complicate the tracing of gold from the continent.⁹⁸

Weak enforcement

Known illegal gold traders active in source and transit countries in the Great Lakes region, hitherto carry on their activities unhindered. It is likely that these individuals benefit from protection or pay bribes to secure their activity. In reports, the GoE regularly mentions the names of such individuals suspected of illegal gold trafficking, or even UN-sanctioned individuals still active in the illicit trade.⁹⁹ Moreover, information suggests that arrested gold smugglers are regularly released.¹⁰⁰

Corruption

Corruption of law enforcement officials facilitates the trafficking in gold at borders, and bribery affects law enforcement efforts in gold-related cases. For instance, according to DRC GoE’s investigations, “customs in the DRC and neighbouring countries, from where smugglers are boarding or transiting to Dubai, do not play their role.” The DRC GoE underlined that “several sources, including customs agents and people involved in the gold sector, told the Group that smugglers bribe State agents at Entebbe, Nairobi and Lubumbashi airports to pass unhindered through controls.”¹⁰¹ The GoE also reported the case of an illegal Tanzanian gold trader who said he had bribed different agents of several law enforcement agencies for a total of USD 6,500 to secure his release.¹⁰²

Disparate regulatory frameworks

Criminals in the region exploit the differences in regulatory framework which allow them to maximise their profits and improve their purchasing power. Gold is smuggled from countries applying high taxes on gold production. Indeed, high taxation is often pointed at as a major cause of gold smuggling from Eastern DRC to neighbouring countries. In the DRC, gold production cumulative taxes reach 13 per cent, contrasting with the rates applied in Rwanda (6 per cent), Burundi (0.5 per cent) and Uganda (0 per cent).¹⁰³ This fiscal burden prevents gold buyers from operating legally and making a profit.¹⁰⁴ Moreover, legal gold is also reportedly heavily illegally

taxed by authorities, meaning that “working in the formal sector often means being taxed twice, officially and informally.”¹⁰⁵

Similarly, illicit gold flows are shaped by the attraction towards countries applying lower export tax rates: Cameroon’s 2.5 per cent export tax rate attracts gold from CAR where the tax is set at 5.25 percent.¹⁰⁶

Purchasing power and cash availability of illicit buyers

Illegal collectors usually propose better prices for gold than legal collectors and out-compete them. For instance, unofficial gold collectors from Cameroon are active in Western CAR. Some of them being reportedly financed by Dubai-based buyers operating from Cameroon. They have the resources to buy in bulk and propose better prices for gold than local collectors. Buying gold near production sites in CAR is very profitable for them since the price per gram was between approximately USD 20 to 27 in 2018, whereas prices in Bangui were around USD 38. It is interesting to note that collectors linked to Dubai-based investors buying gold right on the production site can also be found in Libya, where buyers from Dubai reportedly buy gold in Qatrun in the Fezzan region.¹⁰⁷

Moreover, gold is flowing from CAR towards Cameroon as many Central African gold collectors prefer to sell gold in Garoua Boulai in Cameroon at XAF 25,000 (USD 45) per gram whereas the average price proposed in Bangui’s buying house was XAF 21,150 (USD 38) per gram.¹⁰⁸

Gold produced by semi-mechanized exploitations in CAR is likely to use the same trading system as the one used by ASG. A parliamentary inquiry established that a Chinese company involved in environmental crime shipped their weekly gold production, evaluated at 2.6 kg (conservative estimate), to Garoua-Boulai in Cameroon once a week.¹⁰⁹

The importance of expendable cash can be exemplified further in the relation between smugglers bringing gold from DRC to exporters based in transit countries. Dominating the trade for many years, exporters based in Burundi and Uganda have much larger cash flow than exporters from DRC: they are consequently able to pre-finance Congolese suppliers in larger amounts and offer above-market prices to assure their loyalty and ongoing supply.¹¹⁰

3.5. Gold smuggling Modus operandi in Central Africa

Gold is smuggled within or out of the region both overland and by air. By land, OCGs use concealment methods and take advantage of many cross borders routes. By air, criminals hire associates carrying gold in hand luggage via commercial airlines and use private planes to cross borders.

Smuggling by air

OCGs hire gold-mules to smuggle the mineral via commercial flights or use private jets to move larger quantities.

Commercial airlines

As noted by INTERPOL, OCGs tends to exploit African airlines and airports with low screening facilities to smuggle illicit goods.¹¹¹ Because of weak control and probable corrupt elements, criminals can move large amount of gold via commercial flights.

Open sources analysis suggests that Central African airports may constitute a hub for gold trafficking. After the seizure of 150 kg of gold in Dubai in the luggage of a smuggler flying from the DRC (Lubumbashi) to the UAE (Dubai) once a month by commercial airlines, the DRC GoE estimated that 3.6 tonnes could have been smuggled over the last two years by a single individual.¹¹²

In Cameroon, regular airlines are also used to transport gold: in August 2019, 60 kg of gold hidden in parcels containing passengers' blankets were seized and a network composed of Asian, European, and African criminal was dismantled. More recently a Ndjamena-based Chadian trader tried to export 20.1 kg of gold in a false bottomed suitcase and was arrested in Douala. In Gabon, a Malian national was arrested at the airport heading with 20 kg of gold in his luggage.¹¹³ In the three cases, the gold's final destinations were reportedly the UAE or China.¹¹⁴

Private jets

OCGs also use private planes to smuggle large quantities of gold, as these planes are not always physically checked by customs.¹¹⁵ Open sources reported that Cameroon's authorities arrested two Canadians and a Cameroonian national who were about to smuggle 250 kg of gold to the UAE using a private jet.¹¹⁶ In the Great Lakes region, a report suggested that gold is primarily smuggled from the DRC "by helicopter or fixed-wing small aircraft to a landing strip in Uganda, Rwanda and Burundi." This Modus operandi avoids road smuggling problems, including the poor quality of roads, various check-points and the presence of rebel groups. In 2015, the DRC had 239 registered airstrips, where only 18 operate with customs, mainly in cities.¹¹⁷

Smuggling by road

Smuggling by road can be done in many different ways and using methods of concealment to evade law enforcement controls. The DRC-Uganda border is crossed by approximately 300 smuggling roads with only six official border points.¹¹⁸ In Cameroon, a Mining Brigade (Brigade minière) discovered that some mining companies used modified gas cylinder to conceal and move undeclared gold out of the mining site.¹¹⁹ Gold produced in the Tibesti region in Northern Chad was reportedly smuggled by road and sold to Libyan traders.¹²⁰

Some high ranking political, economic, criminal, state and non-state armed players, inside and outside the region, operating along the supply chain, allow the illegal gold mining activity to happen by creating a criminal synergy.

4. ORGANIZED CRIME GROUPS OR NETWORKS

Some high ranking political, economic, criminal, state and non-state armed players, inside and outside the region, operating along the supply chain, allow the illegal gold mining activity to happen by creating a criminal synergy. This section summarizes some of the inferences and conclusions included in the assessment concerning OCGs. Further detailed information is provided throughout the report. In particular, this section examines the various dynamics of some of the OCGs found to be engaged in illicit gold mining in the Central African region. It highlights how criminal networks connect across the region and focuses on the activities in which groups are involved and how. Where possible, it draws attention to specific criminal networks and outlines how they organize and operate locally, regionally, and transnationally.

4.1. The dynamics of Organized Crime Groups

According to an ENACT research paper¹²¹, illegal gold mining in Africa is controlled by clandestine criminal consortia, which can be defined as “the intersection of politics, business and crime, controlling and exploiting markets both legitimate and illicit for their own ends.”¹²² Indeed, various type of criminal actors are involved in illegal gold mining in Central Africa. Key criminal actors play their role at each stage of the illegal supply chain (financing, production, trade) in source, transit, and destination countries. Due to this criminal synergy, illegal gold flows can leave Central African countries almost unhampered. Open sources analysis shows the system is well entrenched and has been resistant to attempts of formalization of the sector. According to the DRC GoE, illegal gold supply chains out of eastern DRC are “well organised and systematic.”¹²³

However, it is not easy to determine who are the kingpins and where they are located, because their influence is often “veiled behind complex, geographically dispersed networks of intermediaries.”¹²⁴ Some regional dealers are reported to receive financing from abroad, notably from the Gulf region.

In addition, criminal actors might play several roles: for instance, a corrupted local political elite might be also a financier and a member of a board of a mining company. To permit law enforcement to prioritize their action, key criminal stakeholders, i.e. the most harmful criminal actors, are listed below in no particular order:

-- **Financier:** based in the gold source, transit, or destination country. By pre-financing and/or supplying equipment, financiers allow the illegal mining operations to take place and tend to control the supply chain by fixing buying prices in advance. The financier almost certainly has some representatives on the ground, whose role is to make the link between the financier and the production site.

-- **Illegal pit owner or site manager:** responsible for the onsite organization of the gold production, this threat actor is sometimes involved in environmental crimes, human trafficking and abuses.

-- **Important illegal buyer and dealers/traders:** in regional and national hubs, these illegal dealers are usually responsible for the smuggling of the mineral out of the country, and/or out of Africa.

-- **Gold mining companies:** Some national and international mining companies in Central Africa are found to be involved in criminal activities. Some are suspected of concealing the real quantity of gold mined to authorities, of corruption of civil servants, and involved in environmental crime. Some have also teamed up with corrupt politicians and armed group members to protect the illicit operations and secure the mining site.

-- The **refineries** in Central Africa and in the Great Lakes regions are most probably responsible for obscuring the origin of gold and introducing it on the global market by sending/smuggling it towards global market hubs.

-- **Corrupt elites and civil servants:** numerous sources report cases of grand corruption. Corrupt politicians, high ranking civil servants and military officials¹²⁵, are involved in illegal mining. Petty corruption also facilitates illegal gold mining: customs, police, and specialized officers are reportedly involved. The absence of improvement in the formalization of the gold sector in some jurisdictions is likely the result of a lack of political will, suggesting possible conflicts of interests.

-- **Military forces:** DRC GoE's reports regularly mention elements of the Armed Forces of the Democratic Republic of the Congo's (FARDC) involvement in illegal gold mining. Recently, FARDC members were reportedly illegally owning and taxing gold mines, employing between 15,000 and 20,000 diggers, in Mongbwalu. Other FARDC members were allegedly involved in providing security service to unidentified semi-industrial gold mining companies in Irumu and Djugu territories.¹²⁶ A report by UN GoE on DRC remarked that "the distinction between armed groups, criminal networks, and FARDC elements were increasingly blurred".¹²⁷ In Chad, as well, some military forces officials are found to be involved in illegal mining, notably illegally "levying taxes and directly operating drills".¹²⁸

--**Non-state armed groups:** In conflict zones, non-state armed groups draw their resources from the gold mining sector, through attacks on facilities, control of sites and gold flows, and illegal taxation. In the DRC, 64 per cent of gold miners operated in the presence of an armed group actor in 2016.¹²⁹ Some non-state armed groups known to finance their activities through trading in gold are Mai-Mai Yakutumba, Lendu factions, Mai-Mai Malaika, Nduma défense du Congo-Rénové (NDC-R), the Lord's Resistance Army in the DRC¹³⁰ and 3R, Anti-Balaka, Mouvement Patriotique pour la Centrafrique (MPC), Front Démocratique du Peuple Centrafricain (FPRC), and Révolution et justice in the CAR.

-- **Members of other non-identified transnational organized crime groups:** In a recent conference dedicated to illegal mining in the Great Lake region, an EU official said that "gold continues to be a major concern as it continues to be trafficked illegally in large amounts out of the DRC. Armed groups are not the only benefactors of such activities but corrupt state officials as well as international players from Europe, Asia, Middle East and USA are also part of this programme."¹³¹

At the time of writing this report, there were 11 INTERPOL-United Nations Security Council Special Notices alerting global police to individuals and entities that are subject to sanctions imposed by the United Nations Security Council for offences related, but not limited to illegal gold mining in the DRC and the CAR.¹³² There were no valid INTERPOL notices or diffusions for offences related to the illegal gold trade or mining issued by countries from the Central African region or requested by other countries against Central African nationals.

4.2. Non-state armed groups involvement in gold mining in Central Africa

Non-state armed groups in the DRC and CAR finance their activities by controlling some gold mine sites, smuggling routes, and extorting gold through illegal taxation. However, the major part of illicit money generated probably goes to OCGs. Such OCGs benefit from the presence of non-state armed groups, as they facilitate illicit gold mining by generating insecurity and lowering buying prices on sites. Non-state armed groups tend to share increasingly more characteristics with OCGs, that is to say they are less political and more profit oriented.

Collusion between non-state armed groups and transnational organized crime

Armed groups are important actors involved in illegal gold mining and trading in the region. These groups are known to fund their activities by exploiting the ASGM sector: they control gold mine sites, smuggling routes, and extort gold through illegal taxation. These groups mainly operate in the DRC, the CAR, and in the north of Chad. According to a joint study in which INTERPOL participated, the total estimated value attributed to illegally exploited resources in the eastern DRC amounted to over USD 770 million a year.¹³³ The exploitation of gold represents the main source of profits for organized crime in the eastern DRC: the annual net profits to OCGs in the eastern DRC stem from gold and is estimated between USD 40 to 120 million per year.¹³⁴

It is interesting to note that it is estimated that organized crime groups based in the DRC and abroad are believed to receive 98 per cent of the net profits generated by the illegal exploitation of natural resources, whereas non-state armed groups based in the DRC would only capture the remaining 2 per cent. Nonetheless, this share can finance up to 8000 men representing between 25 to 49 armed groups in DRC.¹³⁵

An Experts' background report by the United Nations Environment Program (UNEP)¹³⁶ proposed a typology of armed groups involved in mineral resources in the DRC, which can also apply for non-state armed groups in the CAR:

- Armed groups as security providers : the armed group is potentially paid by the mine operator, who is the final beneficiary of the mining, to protect the operations from other militias;
- Arm groups stealing minerals : the armed group steals the mineral as a short term activity; and
- Armed groups producers: the armed group control the supply chain from extraction to sale to local or regional buyers.

Instability induced by armed groups as a facilitator for illegal gold mining

The UNEP Experts' background report further suggests that large transnational organized crime networks "play a role in keeping armed groups active" so as to create "an environment of insecurity to continue facilitating the illegal extraction and smuggling of natural resources from the eastern DRC". The report underlines the "strategic presence" of armed groups on main smuggling routes and their ability to "facilitate the continuous flow of natural resources to groups outside eastern DRC".¹³⁷

Similarly, the World Atlas of Illicit Flows designates "powerful elites engaged in organized crime" or "powerful political and military elite" or "criminal elite" as the financiers of armed groups and as the main beneficiaries of trafficking and smuggling allowed by the fuelling of conflicts.¹³⁸

Beyond the involvement of transnational organised crime groups, other sources underline the importance of the role of the countries themselves in the development of "cross-border trafficking economies". Either it is through their own direct involvement, or by "influencing which groups can be active by providing or withholding political protection", national authorities have "a defining role in places where the writ of the state (any state) over large geographic localities is weak; on borderlands or on state peripheries."¹³⁹

Armed groups presence induces lower buying price

Another aspect which is worth noting is the ability of armed groups to control the price at which gold is bought. The greater the influence of the armed group over a region or a market, the lower the price will be. In Africa, the price paid at mining sites varies between 75 and 95 per cent of the London Bullion Market Association (LBMA) value of gold. In their area of influence, armed groups

are reported to offer 60 per cent or less of the LBMA value for gold.¹⁴⁰ Providing gold at a lower price, permitting them to maximize their profits, could be another reason for OGC to fuel instability created by the presence of armed groups.

African armed groups share characteristics with organized crime

It is also interesting to note that the motivation of these armed groups tends to be more economic than political. The UNEP expert background report noted that “the protracted conflict cycle and insecurity in eastern DRC appears increasingly dominated by economic interests rather than predominantly political motivations.”¹⁴¹ An ENACT paper similarly considers that armed groups “display many similar characteristics to organised crime” and define them as hybrid entities, having “a strong cross-over between what might be described as loose political organisations – militias or armed groups – and trafficking or smuggling operations”.¹⁴²

In the CAR, several non-state armed groups are involved in illegal mining such as the ex- Seleka and anti-Balaka rebels¹⁴³, and the 3R armed group. The latter exerts its influence over at last 33 mining sites in the Western part of the CAR. The 3R taxes a part of gold production or controls its trade by selling it through their own commercial networks. Indeed, in some places, such as in the Baboua city region, research suggests that armed groups have developed links with prominent traders themselves linked to some Central African politicians.¹⁴⁴

5. ILLEGAL GOLD MINING AND ASSOCIATED CRIMES

5.1. Legal and administrative frauds

OCGs use various frauds to illegally exploit gold and to maximize illegal profits. They illegally partner with foreign companies, abuse or corrupt the administration to obtain authorizations, and they under declare or dissimulate gold production to evade taxes. Involvement of elites is likely to permit protection in case of law enforcement control.

Fraud to obtain licences

In Central Africa, some nationals, sometimes high-ranking officials, who have been granted mining licences, team up with foreign companies to exploit gold illegally. In Cameroon, an NGO reported the following modus operandi used by local elites having partnered with foreign companies: an associate usually collects photocopies of ID cards from villagers on the pretext that a mining company needs such official documents to implement water and electricity facilities in the village. However, the ID is fraudulently used to obtain artisanal mining authorisations, thus permitting them to gain access to land. In the example given, it is said that with 10 copies of IDs, it is possible to obtain artisanal mining authorizations on 40 hectares of lands.¹⁴⁵

Fraudulent trafficking of exploiting permits

In some countries, nationals acquired an exploitation licence and illegally sold them to foreign companies. Such cases were reported by a civil servant of the Ministry of Mines in the Bétaré-Oya in Eastern Cameroon, who regretted the 'laissez-faire' of its hierarchy: artisanal and semi-mechanized licences were sold to Chinese, Korean, and Indian companies.¹⁴⁶

Similarly, in CAR, the creation of mining cooperatives, which is encouraged by authorities to formalize the sector, led to some abuse. Cooperatives are allowed to export, but not to buy gold, since they are supposed to be a producing entity. However, a report noted the development of so-called 'cooperatives banco' in Bangui, a scheme permitting to illegally capture revenues from mining resources. According to the same source, the actors involved in this scheme "may be senior political figures (i.e. former ministers, mayors of mining and forestry communes, civil servants), or even family members of sitting ministers."¹⁴⁷

These cooperatives sometimes also "lend" their cooperative agreement to Chinese mining companies who can exploit gold behind a structure normally owned by a CAR national using semi-mechanized or even semi-industrial techniques "under the cover of an artisanal or semi-mechanized technique"¹⁴⁸

Tax evasion: Dissimulation of produced quantities and under-declaration

Some mining companies conceal the quantity of gold or under-declared it to evade taxes or to facilitate smuggling. Some companies are working by night and move the gold retrieved from the mining site. Moreover, to avoid taxes, some mining companies under-declare the quantity of gold produced in order to avoid taxation calculated on the quantity of gold mined. In 2016, Cameroonian tax authorities evaluated monthly losses at nearly XAF 1,000,000,000 (USD 1,800,000) for the country generated by this type of fraud.¹⁴⁹ In CAR, a commission inquiring on gold mining suspected of environmental crimes revealed that the companies also under-reported the quantities of gold extracted in order to hide part of it from the authorities.¹⁵⁰

Corruption

Petty corruption and grand corruption most probably facilitate illegal gold mining in Central Africa. A Transparency International report noted that mining companies operating in Cameroon are often linked to high level political elites. This partnership allegedly allowed 60 per cent of the companies to operate illegally (i.e. with no proper authorizations, off-limits mining activities, no environmental impact studies, non-rehabilitation of operated sites, etc.), while being protected in case of law enforcement control. This type of protection "neutralize[s] all the efforts of the public authorities to improve the governance of this sector".¹⁵¹

Alleged corruption of specialized civil servants

Some official structures and civil servants dedicated to the monitoring of the gold sector are reportedly involved in corrupt practices. In Cameroon, some civil servants working for the

Illegal gold mining has severe long term environmental impacts, whether from mercury or cyanide pollution or the destruction of natural flora and fauna. The development of semi-mechanized exploitation has a negative impact on rural habitat and livelihood, destroying arable land and rivers. It can also encourage poaching and logging.

monitoring of the ASGM sector are allegedly involved in “night washing sessions”.¹⁵² In the DRC, whistle blowers working at the Center of Expertise and Assessment of Precious and Semi-Precious Substance (Centre d’expertise et d’évaluation des Substance précieuses et semi-précieuse ; CEEC) claimed that the structure would have illegally exported gold.¹⁵³

In 2017, the UN Panel of Experts for CAR (CAR PoE) noted that the Camsona cooperative, located in the city of Sosso-Nakombo near the Cameroon border, created tensions among the inhabitants of the region because of its exploiting methods, contrary to the CAR mining code. The cooperative is run by the mayor of the city and operated with foreign investors. To secure its activity on several sites, it hired a security company employing anti-Balaka militants.¹⁵⁴

5.2. Illegal gold mining and environmental crime

Illegal gold mining has severe long term environmental impacts, whether from mercury or cyanide pollution or the destruction of natural flora and fauna. The development of semi-mechanized exploitation has a negative impact on rural habitat and livelihood, destroying arable land and rivers. It can also encourage poaching and logging.

Chemical pollution

Mercury

Mercury amalgamation technique is a cheap way to extract gold from ore. According to the UN, the ASGM sector accounts for 20 per cent of the world’s annual gold production and is the largest source of man-made mercury emissions: as much as 1,000 tonnes of mercury are released annually.¹⁵⁵ Mercury is very toxic even at small doses and can cause irreversible neurological damage. Mercury persistently contaminates air, soil, and water: it reaches the food chain by poisoning crops, drinking water and fish in rivers.

Central African countries are affected by mercury pollution. In the Republic of Congo, where an estimated 15.9 kg of mercury is released annually, gold mining is the “main cause of pollution of water, fish and public health problems”.¹⁵⁶ Field studies in the CAR revealed that mercury use increased with the recent influx of foreign miners, mainly Chadian collectors and Chinese companies. The mercury detected likely originated from China, Cameroon, Nigeria, or Chad. Sudan being the largest mercury importer in the region is also suspected of supplying eastern CAR.¹⁵⁷

Criminal actors are also directly involved in mercury pollution as they provide the ASGM sector with mercury for free or at low prices to secure and increase their gold supply and reinforce their grip on the sector.¹⁵⁸ In Cameroon, artisanal miners have been observed systematically using mercury, 90 per cent of which is supplied by collectors.¹⁵⁹

Cyanide

Cyanide is also used to extract gold from ore. It is more effective than mercury but it is also more expensive and more technical skills are needed. Cyanide is extremely toxic and has immediate effects on fauna, but is less durable than mercury. However, when mixed with mercury, it can bio-accumulate and has terrible effects on health and the environment.¹⁶⁰

Illegal mining activity is also strongly affecting habitat and livelihoods in rural areas

Mining companies operating near rivers may cause flooding by spilling materials into river beds, like in the Republic of Congo, where several villages in the Kouilou department were flooded.¹⁶¹ In Cameroon, foreign companies, most of them Chinese, reportedly destroyed lands used for agriculture and raising cattle.¹⁶²

Deforestation is another impact of illegal mining as the surface’s vegetation should be removed before being exploited. It also has an impact on fauna, destroying water life because of water turbidity or chemicals, including big animals such as hippos.¹⁶³

Moreover, companies do not respect their obligation to rehabilitate the mining sites after their exploitation, leaving trenches and holes. According to a Cameroonian NGO, these pits left opened have killed at least 115 children and adults between 2017 and 2019 in the East and Adamawa regions of Cameroon.¹⁶⁴

In March 2019, Central African authorities suspended the activities of four Chinese semi-industrial mining companies based in Bozum in the north of the country¹⁶⁵ following the recommendation of a parliamentary investigative commission which concluded that gold exploitation by these companies was not profitable for the State and harmful to the environment and communities. The Ouham River was diverted and polluted, leading to an increase in deaths and miscarriages in fisher’s villages as well as to the destruction of aquatic species.¹⁶⁶

For similar reasons, in August 2019, Cameroonian authorities decided to ban “semi-mechanized artisanal mining activities” and “forbade the use or spill of toxic chemicals near river beds, such as

mercury or cyanide” in order “to preserve the environment, human and animal health, and comply with mining regulations”.¹⁶⁷ It is worth noting that these abuses are fuelling tensions between inhabitants (farmers, or traditional ASGM workers and semi-mechanized companies). Authorities usually do not react pro-actively, but in reaction to the complaints by inhabitants to the authorities.

Development of poaching and small scale logging

Illegal gold miners’ settlements in the forest foster the development of poaching activities of protected species, as reported in south eastern Cameroon, in the Ngoyla-Mintom forests, where some miners practice hunting for personal consumption but also for trade. The increase in the number of miners has led to an increase of need for bush meat. This new access to bush meat also led to an increase in the demand from outside the mining camps.

Mining camps serve as points of supply for traders and poachers in bush meat or other animal parts. Traders sometime provide weapons and ammunitions to the miners. Elephants, gorillas and pangolins are reportedly poached by miners or poachers living in the mining camp.¹⁶⁸ For example, illegal gold mining camps in the Minkebe Park served as relay and supply stations for smuggling groups, including those involved in forest elephants ivory trafficking.¹⁶⁹ Similarly, the presence of mining camps in the forest has created paths and roads, and this access has been attracting an increasing number of people towards small-scale logging activities.¹⁷⁰

5.3. Illegal gold mining and financial crime

Gold allows OCGs to launder illicit money and it has inherent features sought by criminals: high and predictable value, easy to smuggle, can be used as a currency or in gold-for-goods swaps, and can be traded almost anonymously. It generates cash useful to evade banking controls and hinder law enforcement investigations.

Because of its inherent characteristics, gold is a very popular product for organised crime groups: it allows them not only to generate profit but gold is also a vehicle for money-laundering. Illicit money deriving from illegal activities, including illegal mining, can be reinvested in illegal mining operations, or used to buy gold, that can be smuggled and introduced in the formal sector.

Gold has a high and predictable value and provides reliable returns. These features allow financiers to pre-finance ASGM gold mining operations and to agree in advance at what price the extracted gold will be purchased, securing forthcoming profits.¹⁷¹

Gold is very valuable by volume, its high density enables it to be transported and hidden in large quantity in small spaces.¹⁷² In a previously cited example, an offender smuggling gold from the DRC to the UAE was arrested with 150 kg of gold. This important seizure, thanks to gold’s high density, represented only 7.5 litres in volume and was easily hidden in a luggage.

Gold is also used as a currency and a means for exchange in criminal transactions : gold is an alternative to cash to settle debts, or to share profits from criminal activity.¹⁷³ Gold is also used in Hawala schemes and gold-for-goods swaps by illegal gold traders, in order to conceal financial transactions.¹⁷⁴ At the border between Uganda and the DRC, many deals are made in commodities rather than in cash. Motorcycles, cars, construction material¹⁷⁵, fuel and food such as rice and flour¹⁷⁶, are exchanged against gold. These non-recorded transactions aim at laundering the proceeds of crime and hinder law enforcement investigations. This gold-generated cash flow is usually used to buy and smuggle more gold and is an additional obstacle to establishing a legal gold trading system.¹⁷⁷

Moreover, gold can be traded almost anonymously, since transactions are difficult to trace. Many gold transactions are made in cash with no record; hence, it is hard for law enforcement agencies to identify the source or the seller or purchaser. It is therefore also difficult to refute false claims about the source of gold.¹⁷⁸ To illustrate that aspect, the DRC GoE explained that some gold refineries based in the Great Lakes Region, “used cash payments for gold sales and brokered gold between themselves and other traders, sometimes disguising the origin of the gold”.¹⁷⁹ When the Group investigated to verify links between retailers and refineries, most of them just deny being part of the transactions, probably knowing it would be difficult to trace the origin of gold and to identify the parties involved in the process”.¹⁸⁰

Cash is also increasingly used to avoid screening by banks with regard to the origin of funds. When buying gold from the DRC, customers based in Rwanda, Uganda, and in the UAE often refuse to use the banking system to avoid the blocking of transactions towards the DRC by banks. Payments are made with cash, which is usually repatriated to the DRC through money mules.¹⁸¹

5.4. Illegal gold mining and human trafficking

Criminal groups involved in illegal gold mining resort to human trafficking and migrants smuggling to maximise their profits, using coercive and violent techniques. Women and children are vulnerable to exploitation. In conflict areas, where non-state armed groups are involved in illegal mining, trafficking in human beings, which includes sex trafficking, forced labour, and debt bondage are common and have gained international attention.

In the CAR, traffickers, including armed groups, primarily exploit Central African nationals, including children in forced labour in artisanal gold mines.¹⁸² On the CAR gold mining sites, 53 per cent of the workforce is male, 33.6 per cent are women, and it is estimated that 13.4 per cent are children below 15-years old.¹⁸³

A 2014 survey showed that in eastern DRC, 6.7 per cent of surveyed respondents were, at the time, or had been victims of trafficking. Women represented between 25 to 50 per cent of the workforce in gold mining sites¹⁸⁴, and 31.1 per cent of them reported exchange of sex for money. On gold production sites, women are often victims of rape, sexual assault and physical violence.

Child labour was found to affect 22.4 per cent of surveyed minors. Interestingly, the survey noted that “underlying social systems were such that non-armed group actors – such as family members, mining bosses, or government officials – were actually found to be behind many of the coercive labour practices.”¹⁸⁵

In areas non-affected by conflicts, similar abuses are reported. Mine managers were involved in human trafficking, especially forced labour. In Cameroon, criminal elements are reported to force Cameroonian children into labour in artisanal gold mining.¹⁸⁶

Open sources information reported that in Chad, victims are increasingly trafficked from Bicktine in the Guera province, to be sold as slaves at the Libyan border, where they have to work in gold mines under the monitoring of armed groups. The reported price paid for a person is 10 grams of gold.¹⁸⁷ In February 2020, a court convicted a trafficker for forcing multiple victims to work in Chad’s northern gold mines and sentenced the trafficker to three years in prison and a 200,000 CFA (USD 350) fine.¹⁸⁸ Finally, a convergence also exists between human smuggling networks and illegal gold mining in northern Chad. Migrants on their way towards Libya or Europe usually used gold mines sites as stopovers.¹⁸⁹

5.5. Illegal gold mining and increased insecurity

Illegal gold mining can fuel insecurity and the presence of arms on mining sites posing serious security threats to law enforcement. Some miners are equipped with war weapons. In 2014, the Eco guards of the National Park of Minkebe, north of Gabon, were reportedly powerless in the face of an illegal camp of 5000 miners. This included arms, wildlife and drug traffickers, who were finally kicked out from the park by the army.¹⁹⁰

The presence of armed ASGM workers was also reported in 2015 in Chad, when 40,000 illegal miners settled in near Fitri Lake, in Central Chad.¹⁹¹ In CAR, former members of so-called ‘self-defense groups’, having reintegrated back into artisanal mining, are still equipped with artisanal and hunting weapons.¹⁹² Finally, the staff of foreign companies is sometimes armed, introducing weapons or buying them from security forces for their own protection. A case was reported in Cameroon, where a Chinese national killed a miner.¹⁹³

5.6. Some responses to curb illegal gold mining

Complementary to enforcement responses, various international, regional and national initiatives have emerged to fight against illegal mining in the region. The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (henceforth referred to as OECD Due Diligence Guidance) has become the basis of new laws and a reference in industry standards. It provides guidance for companies to avoid contributing to conflict and the worst human rights abuses through their mineral buying. It includes a supplement dedicated to gold.¹⁹⁴

The International Conference on the Great Lakes Region (ICGLR)'s Initiative against the Illegal Exploitation of Natural Resources (RINR), of which the CAR, Congo, and the DRC are members aims at formalizing the ASM sector and at providing, thanks to its Regional Certification mechanism (RCM), "sustainable conflict-free mineral chains" in order to "eliminate financial channels supporting armed groups."¹⁹⁵

The US Dodd Frank Act's Section 1502, for gold originating in the DRC and its neighbouring countries and the EU Regulation on Conflict Minerals¹⁹⁶, which came into force on 1st January 2021 and applies to gold from conflict affected and high-risk areas, essentially oblige companies based in the US and the EU to apply the OECD Due Diligence Guidance on their gold supply chains.

At the regional level, the Economic and Monetary Community of Central Africa (CEMAC), of which Cameroon, the Central African Republic, Chad, Equatorial Guinea, Gabon and the Republic of the Congo are members, has been working to finalize a common mining code for three years as well as a common mining policy.¹⁹⁷ This initiative was supported by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ), a German development agency, which worked with the CEMAC to improve the extractive resource governance thanks to a project called REMAP-CEMAC from 2007 to 2017.¹⁹⁸

In the framework of the new mining codes, national initiatives to formalize the ASGM sector and to canalize gold production towards the legal chain emerged. For instance, in December 2020, Cameroon created the National Mining Corporation (Société Nationale des Mines; SONAMINES) which aims at better controlling the gold exploration and exploitation.¹⁹⁹ Formalisation of the gold supply chain can be defined as "a process that seeks to generate the enabling conditions for accountability in the sector so that it can be integrated into the formal economy".²⁰⁰ Such an approach would help combat crime, increase government revenue, promote the rule of law, as well as improve environmental and human right protections.²⁰¹

It is worth noting that civil society is committed to eliminating illegal mining. Some NGOs are active in informing populations about their rights and encouraging them to document abuses and to lodge complaints against illegal mining activities when social, environmental, human abuses, or corruption cases are found. In Cameroon, for example, NGOs are active in such awareness campaigns²⁰²

However, these efforts of traceability and due diligence are still moderately applied for gold. The DRC GoE recently noted that "mineral traceability and due diligence measures were implemented in the tin, tantalum and tungsten sectors" but noted that such efforts were "largely absent in the gold sector."²⁰³ Moreover, recent studies show that these measures induce compliance costs, which renders legally-sourced gold less competitive than the illegal gold.²⁰⁴ Also, it is reported that some companies prefer to avoid sourcing gold from certain regions, even if free of conflicts, and thus fail to support the progressive formalization effort advocated by the OECD guidance. For instance, as reported by an Artisanal Gold Council article, Gabon's government gold buying

agency, experienced difficulty selling gold to Europe, and is likely to export it towards less observant hubs at the expense of due diligence.²⁰⁵

6. COVID-19 IMPACT ON THE ILLEGAL GOLD SUPPLY CHAIN IN CENTRAL AFRICA

It is likely that the OCGs operating in the region benefited from the recent COVID-19 crisis by buying and stockpiling gold at lower prices at production sites and introducing it at higher prices on the global market. Whilst smuggling by air came to a temporary halt, inland smuggling routes remained active. This situation resulted in a temporary blocking of supply routes and drying up of funding, illustrating the importance of international actors involved in the illicit gold trade.²⁰⁶

The COVID-19 pandemic had a paradoxical impact on the gold market. Whilst it strengthened gold as a strategic asset²⁰⁷, reaching its highest price ever at USD 2,048 an ounce in August 2020,²⁰⁸ field gold prices in Africa fell by 30 to 50 per cent due to the disruption of the ASGM supply chains, as a result of borders closing and the shutting down of passenger air traffic to halt the pandemic's expansion.²⁰⁹ In the CAR, in May 2020, the gold price at the mining site had dropped by 50 to 60 per cent of the world market price. However, since then, it seems that gold prices have undergone a progressive recovery.²¹⁰

OCGs have probably seized the opportunity to maximize their profits by buying at low prices and selling at high prices on the global market. As commercial flights were disrupted, an NGO reported that some gold traders from Nairobi, Kenya flew to Uganda and into the Eastern DRC in private jets to buy and export gold.²¹¹

Information suggests that illegal players might have built up their stocks during this period. The DRC GoE reported that some "mining authorities confirmed that cross-border gold smuggling between South Kivu [in the DRC] [...] in the DRC and Burundi and Rwanda had increased during the COVID-19 lockdown."²¹² A major gold refiner based in Uganda estimated that "for gold dealers, this is a once in a lifetime opportunity, but only if you can get it out of Africa and turn it into cash."²¹³

A positive outcome was noted in Gabon where the closure of borders resulted in a re-direction of artisanal gold from illegal flows towards the CGCO (Comptoir Gabonais de Collecte de l'Or), the legal government buying agency. Illegal gold buyers who usually dominate the market, were unable to smuggle gold by air or land as usual because of the closing of frontiers. Miners likely sold their production via the legal sector, despite a less competitive buying price.²¹⁴

Conclusions

This assessment explores how organized crime exploits the illegal gold mining sector in Central Africa. It describes illegal mining and the way the illegal industry operates. It draws attention to

the fact that the ASGM sector, for which the supply chain sector in Central Africa is mainly illegal, is attracting an increasing numbers of individuals, either Central African nationals but often illegal migrant workers. ASGM in the region constitutes a reserve workforce for OCGs and a potential factor of instability. Moreover, the settlement of foreign semi-mechanized mining companies, suspected of corruption and fraud, is likely generating social tensions in several countries. Using improved techniques to boost gold output, these companies are likely to inject more gold in the illegal supply chain, reinforcing the OCGs at the expense of national authorities in the region.

The assessment also examines the estimated gold production and extent of smuggling, and the routes used within and outside of the Central African region. Official statistics on production and export are scarce, or not significant. However, discrepancies in estimated production and export figures indicate that most gold is illegally produced, concealed to authorities, and smuggled out of the countries. This opacity is preventing the countries in the region from having a clear picture of the phenomena and facilitates the exploitation of the sector by OCGs.

The assessment also noted that gold from the CAR is mainly smuggled to Cameroon, and gold from the DRC is mainly smuggled towards East Africa, mainly to Uganda, Rwanda, and Burundi. From these transit countries, gold is mainly exported or smuggled towards the UAE, to Europe, and Asia as final destinations. Several factors enable and foster gold smuggling within Central Africa and towards destination countries: OCGs corrupt law enforcement agents, use fraud to conceal gold origin, facilitated by using forged documents or by smelting gold. They also take advantage of weak law enforcement, disparate export rates in the region, and they control illegal gold flows due to their superior purchase power. Gold is smuggled within or out of the region both overland and by air. By land, OCGs use concealment methods and take advantage of many cross borders routes. By air, criminals hire associates carrying gold in hand luggage via commercial airlines and by using private planes to cross borders.

The assessment also presented the various criminal actors involved in illegal gold mining. It noted that OCGs including high ranking political, military, and economic actors, as well as non-state armed groups, based inside and outside the region, operate along the supply chain, allowing the illegal gold mining activity to happen by creating a criminal synergy. Moreover, non-state armed groups in the DRC and CAR are also involved in illicit gold mining: they finance their activity by controlling some gold mine sites, smuggling routes, and extort gold through illegal taxation. However, it is worth noting that the major part of illicit money generated goes to OCGs. Such OCGs benefit from non-state armed groups' presence, as it facilitates illicit gold mining by generating insecurity and induce lower buying prices on sites.

The assessment also described the crimes associated to illegal gold mining such as fraud, environmental crimes and trafficking in human beings. It showed that OCGs use various frauds to exploit illegally gold and to maximize illegal profit: they illegally partner with foreign companies, abuse or corrupt the administration to obtain authorizations, they under declare or dissimulate gold production to evade tax. Involvement of elites is likely to permit protection in case of law enforcement inspection.

Illegal gold mining has severe long term environmental impacts, whether from mercury or cyanide pollution, or destruction of natural flora and fauna. The development of semi-mechanized exploitation has a negative impact on rural habitat and livelihood, destroying arable land and rivers. It can also encourage poaching and logging.

As far as financial crime is concerned, the report showed that gold may allow OCGs to launder illicit money. Because of its inherent features, gold is sought by criminals. Gold has a high and predictable value, is easy to smuggle, can be used as a currency or in gold-for-goods swaps, can be traded almost anonymously. It also generates cash useful to evade banking controls and hinder law enforcement investigations.

Criminal groups involved in illegal gold mining resort to human trafficking and migrants smuggling to maximise their profits, using coercive and violent techniques. Women and children are vulnerable to exploitation. Illegal gold mining can fuel insecurity and the presence of arms on mining sites posing serious security threats to law enforcement.

Finally, it examined the impact of COVID-19 on illegal gold mining in the region, highlighting that it is likely that the OCGs operating in the region benefited from the recent COVID-19 crisis by buying and stockpiling gold at lower prices at production sites and introducing it at higher price on the global market. Whilst smuggling by air came to a temporary halt, inland smuggling routes remained active.

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