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CAPACITY BUILDING FOR A RESPONSIBLE MINERALS TRADE

FINAL REPORT



DECEMBER 2018

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Cover Photo: Two miners at Nyamurhale (South Kivu) taken by StoryUP

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Civil society plays a crucial role in ensuring the credibility of a responsible minerals trade in DRC. CBRMT was fortunate to have worked closely with dedicated local civil society advocates from Eastern DRC as well as the Enough Project, all of whom provided valuable support and feedback to our efforts.

CBRMT also collaborated with numerous other independent stakeholders, including 35 mining cooperatives, large-scale mining companies such as Banro and Alphamin Bisie, the impact investor Fair Congo, Google, the Responsible Minerals Initiative, and the Organisation for Economic Co-operation and Development. These collaborations supported the foundation of our efforts, enabled us to share lessons learned, and deepened our collective impact.

ACRONYMS AND ABBREVIATIONS

3TG	Tin, Tantalum, Tungsten, and Gold
3Ts	Tin, Tantalum, and Tungsten
ABM	Alphamin Bisie Mining
ASM	Artisanal and Small-Scale Mining
BGR	German Federal Institute for Geosciences and Natural Resources
BSP	Better Sourcing Program
CBRMT	Capacity Building for Responsible Minerals Trade
CEEC	Centre d'Expertise, d'Evaluation et de Certification (Center for Evaluation, Expertise, and Certification)
COMICA	Coopérative Minière des Creuseurs Affectés
DRC	Democratic Republic of the Congo
GDRC	Government of the Democratic Republic of the Congo
GIZ	Gesellschaft für Internationale Zusammenarbeit (German Society for International Cooperation)
ICGLR	International Conference for the Great Lakes Region
IMCA	Independent Mineral Chain Auditor
ITOA	Initiative de Traçabilité de l'Or d'Exploitation Artisanale (Initiative for the Traceability of Artisanal Gold)
iTSCi	International Tin Research Institute Tin Supply Chain Initiative
LBMA	London Bullion Market Association
LSM	Large-Scale Mining
MGM	Mongbwalu Gold Mines
MoM	Ministry of Mines, Government of the Democratic Republic of the Congo
MOU	Memorandum of Understanding
OECD	Organisation for Economic Cooperation and Development
PTF	Partenaires Techniques et Financiers (Technical and Financial Partners)
RAGS	Responsible Artisanal Gold Solutions
RCM	Regional Certification Mechanism
RMI	Responsible Minerals Initiative (formerly Conflict-Free Sourcing Initiative, or CFSI)

RMT	Responsible Minerals Trade
SAEMAPE	Le Service d'Assistance et d'Encadrement de l'Exploitation Minière Artisanale et de la Petite Echelle (Service for Assistance and Supervision of Artisanal and Small-Scale Mining) (formerly SAESSCAM)
USAID	United States Agency for International Development
VR	Virtual Reality
ZEA	Zone d'Exploitation Artisanale (Artisanal Mining Zone)



KEY TERMS

Artisanal and Small-Scale Mining/Miners: The report refers to artisanal miners using basic hand tools to extract tin, tantalum, tungsten, and gold.

Conflict-Free Minerals: This designation refers to the absence of armed groups either directly or indirectly controlling or benefiting from the extraction of artisanal minerals.

Downstream: This refers to actors in the supply chain who export, refine, and produce end products (e.g., jewelry and laptops). They are on the receiving end of minerals mined “upstream.”

Due Diligence: An ongoing, proactive, and reactive process through which companies can identify, prevent, mitigate, and account for how they address all adverse impacts that may occur in a supply chain as an integral part of business decision-making and risk management systems.

International Conference on the Great Lakes Region (ICGLR): Artisanal mining in the DRC occurs within and is regulated by this regional institution and framework. The DRC is one of 12 member states, the others of which are Angola, Burundi, Central African Republic, Republic of Congo, Kenya, Rwanda, Republic of South Sudan, Sudan, Tanzania, Uganda, and Zambia. Among other protocols aimed at increasing security and stability in the Great Lakes region, the ICGLR is responsible for implementing the Protocol Against the Illegal Exploitation of Natural Resources.

ICGLR Audit Committee: A tripartite forum representing government, industry, and civil society that manages the audit process through which auditors are accredited and the standards and terms of reference for the audits are set. Responsible for the reviewing audit reports submitted by the accredited auditors.

Independent Mineral Chains Auditor (IMCA): The party responsible for conducting independent investigations to ensure the credibility of conflict-free mineral supply chains and certificates in the region.

Regional Certification Mechanism (RCM): One of the six tools of the ICGLR’s Regional Initiative Against the Illegal Exploitation of Natural Resources. It provides guidance to member states in the Great Lakes region on mine site certification, chain of custody tracking, and export certification.

Regional Initiative Against the Illegal Exploitation of Natural Resources: Promotes dialogue between ICGLR member states on issues related to the illegal exploitation of natural resources and provides them with tools aimed at breaking the link between armed conflict and revenues from natural resources.

Responsible Artisanal Gold Solutions (RAGS) Forum: Comprises private sector companies, nongovernmental organizations, donors, and implementing partners convened by Resolve. It aims to (1) assess, design, and implement pilot supply chain(s) from eastern DRC to a participating refiner, allowing downstream manufacturers, retailers, and other end users to include this artisanal gold as part of a range of responsible sources for their products; (2) support technical and policy coordination with partners who manage and implement sourcing projects, policies, guidance, and standards to align forum work with existing projects and systems and to mitigate risks likely to arise in sourcing efforts; and (3) promote shared learning and broader engagement of industry, government, and civil society in support of scaling up responsible artisanal gold trade in the Great Lakes region.

Responsible Minerals: Goes beyond the minimum threshold of being free of conflict to encompass a broad set of social and environmental considerations, including the absence of child labor. Generally refers to minerals that meet Organisation for Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Supply Chain: A sequence of processes from the mine site to the point of export that includes people, activities, and information. CBRMT-supported supply chains receive funding and technical assistance to implement due diligence and/or traceability.

3TG: Tin, tantalum, tungsten, and gold. The 3Ts referred to in combination with gold. All these minerals are mined by hand in the DRC by men and women using basic hand tools. Tin, tantalum, and tungsten are often used in electronics, including laptops and cellphones. In addition to being used in jewelry, gold is also a key component of electronics.

3Ts: Tin, tantalum, tungsten.

Traceability: A system that can include but is not limited to bagging and tagging or electronic systems to physically track minerals, or a chain-of-custody system using a range of documents that identify the provenance of minerals and their transport to identify origin of the minerals.

Upstream: This refers to actors involved in extracting minerals. In the DRC, upstream actors include the men and women who mine and the mining services that oversee the mining.

Zone d'Exploitation Artisanale (ZEA): The DRC policy tool for guaranteeing security in the artisanal sector is the designation of artisanal mining zones, or zones d'exploitation artisanale (ZEAs). The DRC Mining Code stipulates that all artisanal exploitation must occur within a ZEA to be legal, however the majority of artisanal mining still occurs outside of ZEAs.

OVERALL IMPACTS



Legal and Policy Reform

Contributed to national and **regional policy reform**

15 Artisanal Mining Zones created



Responsible Minerals

1st artisanal gold supply chain from DRC to export to an LBMA good delivery refinery

23 tons of conflict-free tin traced from mine site to exporter in the DRC



Due Diligence & Traceability Systems

129 mine sites monitored by systems

4,471 miners worked at mine sites where systems were established

1,119 incidents recorded on digital platforms across three provinces



Capacity Building

2,699 persons trained in support of a responsible minerals trade across four provinces

20 modules developed and **92 trainings** delivered

2,409 attendees from the private sector, civil society, and DRC state actors

35 cooperatives participated in due diligence, property rights, and conflict resolution training

100% of women stated that after receiving training, they understood their rights to work at a mine site

514 DRC Mining Services staff trained



Coordination & Outreach



29,673 unique views of the *Journey of Gold* virtual reality film

Held **36 outreach events** reaching **813 participants**

Responsible Minerals Portfolio film was the **most watched video** on USAID/DRC Facebook site

With the **Responsible Artisanal Gold Solutions Forum**, shared lessons from gold pilots

Crafted a Responsible Gold Social Action Kit with **9,200 views**

Leveraged **private sector partnerships** to expand impact





OUR
WORK

EXECUTIVE SUMMARY

CAPACITY BUILDING FOR A RESPONSIBLE MINERALS TRADE

The United States Agency for International Development's (USAID's) Capacity Building for a Responsible Minerals Trade (CBRMT) project was implemented in the Great Lakes region of Central Africa with a specific focus on the Democratic Republic of the Congo (DRC) from July 2014 through December 2018. The project strengthened the capacity of local and regional actors to manage conflict-free supply chains and introduced a new system to trace and conduct due diligence of artisanal tin, tantalum, tungsten, and gold (3TG). This report describes achievements and challenges, shares key products, and suggests ways to advance responsible sourcing of minerals in the DRC.

BACKGROUND

This Final Report summarizes achievements, challenges, and lessons learned during the implementation of the CBRMT project from 2014 to 2018. Initially funded as an 18-month project with the primary aim of increasing the scale and quality of the conflict-free minerals supply chains, the project ultimately was extended to four years. This USAID-funded project supported the Government of the Democratic Republic of the Congo (GDRC) and the International Conference for the Great Lakes Region (ICGLR) to establish and scale up a responsible minerals trade (RMT) from the region and transform the region's mineral wealth into a tool for economic growth and development. To achieve these aims, CBRMT worked with the GDRC Ministry of Mines (MoM) and targeted mining sector actors to increase the volume of conflict-free minerals and improve the integrity of due diligence and traceability systems in the DRC. The project also strengthened the ICGLR by improving its financial and management capacity as well as its monitoring and auditing of conflict-free supply chains.

With each extension, CBRMT's structure and design underwent changes. From 2014 to 2017, CBRMT's head office was in the DRC capital city of Kinshasa, with smaller field offices in Goma, DRC, and in Bujumbura, Burundi. When the project was extended in 2016, CBRMT closed its office in Burundi as the result of a combination of a decreased emphasis on supporting the ICGLR and concerns regarding the security of project staff. The project's Chief of Party and Component Leads were originally based in Kinshasa until July 2017, at which time they shifted to Goma. CBRMT simultaneously established a presence in Bukavu and Walungu in South Kivu Province, represented by three members of CBRMT's Gold Team. The Better Sourcing Program (BSP) operated from a Bukavu base for the duration of the project, fielding monitors to various sites in the DRC provinces of North and South Kivu and Maniema.

This section provides a summary of baseline assessments and an overview of key achievements by component in four domains: (1) Legal and Policy Reform, (2) Capacity Building, (3) Responsible Artisanal Supply Chains, and (4) Coordination and Outreach. Detailed component-level summaries constitute the main body of the report and are supplemented by a comprehensive list of CBRMT project documents and a final performance indicator table.

CROSS-CUTTING BASELINE ASSESSMENTS

At the start of the project, CBRMT staff and experts conducted a series of baseline assessments to inform project design. They used scoping exercises to assess the legal and policy framework, identified potential supply chains, and gathered critical information on property rights and dynamics in the artisanal and small-scale mining (ASM) sector. Comprised of governmental and civil society representatives, the research teams identified opportunities and constraints faced by upstream stakeholders in implementing due diligence and traceability schemes, as well as the challenges associated with the formalization of the ASM sector. An environmental analysis identified potential environmental risks and informed appropriate mitigation strategies, which were outlined in an environmental management and mitigation plan. Finally, a gender analysis served to identify the differentiated roles men, women, and children play in the sector. Using USAID's Gender Analysis Framework, CBRMT analyzed access, beliefs, practices, time and space, rights, and power within the ASM sector in the DRC. CBRMT's resulting gender strategy adopted a consultative "do no harm" approach in which the project sought to benefit men *and* women miners. These assessments informed activity design for the four components of CBRMT: legal reform, capacity building, responsible supply chains, and communication and outreach.

COMPONENT 1: LEGAL AND POLICY REFORM AND STRENGTHENING THE ICGLR

To transform policies governing artisanal mining in the DRC and the Great Lakes region, CBRMT worked closely with GDRC counterparts, the ICGLR, and governmental and nongovernmental partners. CBRMT made contributions to the revision of the DRC's Mining Code, structure and functioning of the ICGLR, and Regional Certification Mechanism (RCM) and Independent Mineral Chain Auditor (IMCA). Notable achievements include provisions in the Mining Code favorable to artisanal mining, an organizational and financial management capacity assessment of the ICGLR, the support of eight independent third-party audits, the establishment of the IMCA, and supporting the establishment of artisanal mining areas (ZEAs). For more details on CBRMT's legal and policy reform activities, see section I (Policy Reform).

COMPONENT 2: CAPACITY BUILDING

CBRMT's Field Training Coordinator and Capacity Building Advisor first assessed the capacity gaps and needs of partners, and then led the design and implementation of tailored capacity building activities. The activities reached 2,699 beneficiaries, including ASM cooperatives, DRC government mining staff, civil society representatives, and other key stakeholders. The design phase was preceded by an assessment to identify strengths and capacity gaps, which informed the tailored design of interventions. A combination of formal training, observation, field-based exercises, coaching, demonstrations, and participatory theater were employed based on audience capacity, needs, and context. Topics included traceability and due diligence, cooperative organizational structure, administration and governance (e.g., decision-making and benefit-sharing), financial management, legal rights and responsibilities; labor rights, and environmental health and safety. At the conclusion of the project, the team consolidated training modules into compendiums and delivered to GDRC stakeholders, civil society, and private sector partners. For more details on CBRMT's capacity building activities, see section 2.

COMPONENT 3: RESPONSIBLE ARTISANAL SUPPLY CHAINS (TIN, TANTALUM, TUNGSTEN, AND GOLD)

Artisanal mining of 3TG takes place at over 2,000 mine sites in eastern DRC, feeding into complex supply chains that are informal and unregulated, and serve to support ongoing fraud and smuggling. For example, at the time of CBRMT's launch, no operating due diligence or traceability system existed for artisanal gold in the DRC. The illegal trade in these minerals also generates income for nonstate armed groups, illegal criminal networks, and public security forces. To address these challenges, CBRMT began by assessing existing efforts to identify strengths and capacity gaps to inform the design of our interventions. This was followed by detailed baseline studies of potential pilot sites and, eventually, by the establishment and scaling up of new certification systems and procedures for both the 3Ts and gold.

CBRMT's initial deliverable of establishing due diligence and traceability systems at 250 to 400 mine sites over 18 months was not clearly defined and eventually proved to be unrealistic. As a result, project targets were revised to focus on three supply chains, at least one of which had to be gold. Over the course of the project, numerous critical milestones were achieved, including the DRC's first export of responsible artisanal gold from South Kivu; the establishment of the DRC's first alternative program for certifying conflict-free tin and tantalum; the first real-time electronic due diligence database accessible through an online dashboard; the first sale of artisanal gold from the DRC to a London Bullion Market Association (LBMA) good delivery refiner; and the recording, sharing, and mitigation of incidents in collaboration with key actors and authorities. For more details on CBRMT's activities in relation to responsible artisanal supply chains, see section 3.

COMPONENT 4: COORDINATION AND OUTREACH

To maximize leverage and impact, CBRMT closely coordinated activities with a broad cross section of international, national, and regional public and private sector actors. Central to coordination efforts was the role of Resolve and its Responsible Artisanal Gold Solutions Forum, as well as the convening of actors involved in responsible minerals in the DRC through the Technical and Financial Partners (Partenaires Techniques et Financiers) Forum. An unexpected opportunity with Google to produce a virtual reality film helped elevate awareness about responsible gold sourcing, bringing key messages to more than 29,000 viewers. Finally, CBRMT produced a film on USAID's RMT portfolio in the DRC—not only covering CBRMT's activities, but also encompassing mine site validation activities conducted by the International Organization of Migration. The film premiered on the USAID/DRC Facebook page; was screened at the LBMA Critical Minerals Conference and the Responsible Minerals Initiative Conference and was posted on USAID's Land Links page, reaching over 2,300 viewers to date. For more details on CBRMT's coordination and outreach activities, see section 4.



I. POLICY REFORM

LEGAL AND POLICY FRAMEWORK IMPROVED

CBRMT contributed to shaping the legal and policy framework for responsible minerals at the regional, national, and local levels. At the regional level, CBRMT provided substantial technical support to the International Conference of the Great Lakes Region (ICGLR). This effort included support of third-party audits, evaluation of the Regional Certification Mechanism (RCM), and establishment of the Independent Mineral Chains Auditor (IMCA). At the national level, CBRMT provided guidance to the Ministry of Mines (MoM) in revising Mining Code provisions relating to artisanal mining. At the local level, CBRMT helped to secure the legal recognition of 15 artisanal mining areas.

BACKGROUND

To transform artisanal mining to a formalized, responsible economic activity, CBRMT provided technical support to advance the formalization of the artisanal mining sector and to address legal and policy loopholes that undermine a secure and conflict-free artisanal mining trade. CBRMT produced legal briefs, provided policy guidance to the Government of the Democratic Republic of the Congo (GDRC) in reforming its Mining Code, and improved traceability and due diligence systems. Implemented during a period of regional and national policy change in respect to artisanal minerals, the project enjoyed a rare opportunity to directly contribute to the analysis and advocacy to shape key policies. For example, the ICGLR was revisiting its Regional Certification Strategy and defining an approach for responsible gold, while the DRC was revising its Mining Code. CBRMT made substantial contributions through policy analysis, participation in national and regional conference and consultative sessions, and coordinated policy engagement through bodies such as the Technical and Financial Partners (Partenaires Techniques et Financiers) (PTF) and the Responsible Artisanal Gold Solutions (RAGS) Forum.

AT THE REGIONAL LEVEL

International Conference of the Great Lakes Region

CBRMT took steps to advance the establishment of responsible sourcing of artisanal gold through its regional partner, the ICGLR. To identify areas to which to tailor its technical support, CBRMT conducted assessments of the ICGLR's organization and financial systems. The resulting reports highlighted significant deficiencies within the ICGLR Secretariat in the areas of decision-making, financial accountability, budgeting and planning, human resources, internal controls, payroll, travel policies and procedures, asset management, and financial sustainability. The ICGLR declined to accept the proposal



Independent
Mineral Chain
Auditor
established

Supported
drafting of DRC's
National Strategy
for Artisanal Gold

8
third-party audits
conducted

Legal and policy
reforms
implemented

15
Artisanal Mining
Zones legally
established

that two technical advisors be embedded within the Secretariat to help them address these deficiencies. As a result, CBRMT limited its support to providing a suite of financial and organizational recommendations to strengthen the ICGLR's financial operations and management systems, including organizational structure, delegation of authority, policies and procedures, systems and processes, staffing, and training.

One of the original challenges in CBRMT's support of the ICGLR was ensuring close coordination with other donor activities and policies, many of which overlapped or contradicted the United States Agency for International Development's (USAID's) original objectives. An additional challenge was the decision-making structure of the ICGLR, which is highly centralized and contingent upon the consent of all member states, often resulting in long delays and additional unexpected costs.

Third-Party Audits

Third-party audits are a tool of the ICGLR's RCM to ensure that 3TG exports meet the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. These independent mine site audits are intended to cross-check annual government inspections and are overseen by an audit committee of the ICGLR. The process involves auditing a sample of an exporter's mine sites and supply chains to determine conformance with the requirements of the ICGLR RCM Certification Manual.

To strengthen the ICGLR's capacity to monitor and audit regional, conflict-free supply chains, CBRMT provided significant support to the organization's third-party auditing function. This assistance took the form of guidance to the ICGLR Audit Committee and the direct support of the audits. CBRMT provided technical assistance and funding to the Audit Committee to develop a set of standard templates and methodologies. CBRMT also directly supported eight independent third-party audits in the DRC and Rwanda between August 2015 and March 2016, which involved identifying and contracting credible firms and overseeing the execution of the audits.

The audits helped exporters to ensure their compliance with OECD due diligence requirements and functioned as a hands-on training exercise to help them improve the outcome of future audits. The final audit reports were reviewed at a training session led by representatives from the Responsible Minerals Initiative (RMI). CBRMT's work with ICGLR Audit Committee members enabled them to improve their understanding of how to interpret audit results, establish audit criteria, and provide feedback. CBRMT and RMI also jointly convened a meeting at the 10th Annual OECD Forum on Responsible Mineral Supply Chains in April 2016 with the auditors and members of the Audit Committee to discuss lessons learned and how the process could be improved upon for future audits.

Regional Certification Mechanism

CBRMT provided technical assistance on the reform of the RCM, one of six tools of the ICGLR's Regional Initiative Against the Illegal Exploitation of Natural Resources. This effort began with a thorough evaluation of the RCM, including the chain of custody tracking, export and certification procedures, third-party audits, a

regional mineral database, and the role of the IMCA. The ICGLR retained many of the



Figure 1. Participants from the 4th Meeting of the ICGLR Mining Ministers Meeting held in Brazzaville, Congo, October 2017. Photo courtesy of the ICGLR. CBRMT's Deputy Chief of Party pictured fourth from left, bottom row.

resulting recommendations made by CBRMT to improve the credibility, efficiency, and efficacy of the mechanism.

CBRMT then prioritized the revision of the RCM Certification Manual by collaborating with the ICGLR, RMI, and the German Society for International Cooperation (GIZ) in the recruitment process for specialists to lead RCM reform. In 2018, Levin Sources and Responsible Sourcing began holding regional consultations to revise the RCM Certification Manual. With support from GIZ, the technical specialists are continuing to develop a set of practical recommendations to ensure the RCM is more efficient, sustainable, and credible. CBRMT also co-organized an exporters workshop in March 2017 that brought together more than 20 regional mineral exporters to improve their understanding of the third-party audit process and the RCM. One of the chief recommendations was that ICGLR member states align the multiple traceability and auditing systems in the region. RCM reform is ongoing, and a revised Certification Manual and streamlined certification process are expected to be presented to ICGLR member states for approval in early 2019.

Independent Mineral Chains Auditor

The IMCA serves as a special investigator and a guarantor of regional compliance with the RCM through independent investigations to ensure the credibility of conflict-free mineral supply chains and certificates in the Great Lakes region. In 2015, CBRMT led an assessment of the IMCA and produced an IMCA Implementation Plan. Subsequently, CBRMT facilitated the IMCA recruitment and selection process and supported the individual's appointment from March 2016 through May 2017. During this time, CBRMT revised the foundational documents governing the IMCA, including the terms of reference, communication and reporting protocols, and confidentiality agreement to ensure the independence and transparency of the office.

A lack of political support and buy-in within the ICGLR forestalled a long-term commitment to the office, and the IMCA was unable to accomplish many of his intended objectives. A notable exception was that the IMCA completed an audit of the Société Aurifère du Kivu et du Maniema), which was the first such evaluation in the DRC (see the [DRC Audit Executive Summary](#)).

AT THE NATIONAL LEVEL

Legal and Regulatory Reforms

At the same time the CBRMT team was pursuing improvements to the regional responsible sourcing framework, we were also actively seeking to influence national-level mining policies within the DRC. To accomplish this, CBRMT completed a legal and policy review of the DRC's Mining and Land codes, with a focus on artisanal mining. These analyses identified opportunities and obstacles for the artisanal mining sector contained in the 2002 Mining Code, in particular the lack of tenure security for miners and mining cooperatives. The resulting report presented an analysis of the DRC mining legal framework and proposed amended texts that focused on the central question, "What prevents miners from having secure, legal access to mineral resources?" The report underscored the importance of security and transparency for land tenure, the recognition of customary land rights, integration of differing land tenure systems, and coordinating laws between the Land and Mining Codes. The report proposed revisions to the Mining Code, relevant provisions to artisanal mining in the Land Code, and other relevant legal frameworks and policies that govern artisanal access to and control over mineral resources in the DRC. These recommendations shaped subsequent policy advocacy efforts over the next four years.

In support of the official revision of the DRC 2002 Mining Code, CBRMT submitted a suite of recommendations in August 2017 to clarify the rights and obligations of artisanal miners and mining cooperatives. The recommendations, which were submitted to the MoM, Senate, Mining Secretary General, and National Assembly's Committee on Mining Code Reform, sought to ensure provisions were favorable to artisanal mining. Several of CBRMT's proposed legal reforms were incorporated into the revised Mining Code passed in 2018. These include requiring miners to work within a cooperative and requiring cooperatives to comply with health, environment, and safety laws and regulations and ensure the prevention of incidents.

National Strategy for ASM Gold

CBRMT provided technical assistance regarding Ministerial Decree 0918, which concerns the implementation of the DRC's new traceability system for artisanal gold known as the Initiative for the Traceability of Artisanal Gold (ITOA). The project team co-convened a joint technical workshop on the National Artisanal and Small-Scale Mining Gold Strategy with the German Federal Institute for Geosciences and Natural Resources (BGR) in October 2018. The workshop brought together 70 DRC state officials, and civil society and private sector partners to lay the groundwork for a national strategy for responsible artisanal gold mining and trade in the DRC. The aim was to develop a national road map for implementing the DRC's Artisanal and Small-Scale Mining Strategy through recommendations to advance (1) formalization of the sector; (2) financing of artisanal gold mining; and (3) taxation and marketing of artisanal gold from mine to market. Recommendations were shared with the MoM.

AT THE LOCAL LEVEL

Security of tenure is a basic requirement for the stability of a responsible mineral supply chain, and any successful mining enterprise. The DRC policy tool for guaranteeing this security in the artisanal sector is the designation of artisanal mining zones, or zones d'exploitation artisanale (ZEAs). The DRC Mining Code stipulates that all artisanal exploitation must occur within a ZEA to be legal. Accordingly, a key objective of CBRMT's efforts related to policy and legal reform was to increase the number of ZEAs established at mine sites where CBRMT was operational. Establishing ZEAs is not only a legal requirement, however, but also a critical tool for clarifying, securing, and defending the tenurial rights of artisanal mining cooperatives to mine sites, aiding cooperatives in being compensated if mine sites are appropriated by outside interests, and enabling the long-term sustainability of responsible mining supply chains.

Prior to CBRMT, the GDRC had established only 60 official ZEAs, many of which were in remote and less mineral-rich areas. To put this in perspective, out of 662 active artisanal gold mine sites in the DRC in 2015, only 18 of the sites were located in ZEAs. Over the course of the project, CBRMT worked with DRC MoM and mining cooperatives to legally establish an additional 15 ZEAs in South Kivu, including and surrounding the Nyamurhale gold pilot site. Support included assisting cooperatives in drafting applications for ZEA designation, supporting field missions by DRC authorities to verify potential ZEAs, confirming the tenurial status of potential ZEAs, and producing global positioning system maps. Further, CBRMT conducted an environmental impact assessment of Nyamurhale, the first of its kind at an artisanal gold mining site. This is a new requirement of the 2018 revised DRC Mining Code.

MOVING FORWARD: Recommendations for building on CBRMT's efforts in legal and policy reform include the following:

- **Complete the RCM reform process.** Support the revision of the ICGLR RCM in close consultation with the ICGLR, German Society for International Cooperation, and other partners.
- **Address audit findings.** Review findings from the DRC IMCA audit to determine ways in which to further controls and improve structures for responsible sourcing.
- **Conduct joint activity planning and cost-sharing.** Work with other donors and organizations in the region.
- **Advocate for inclusion of artisanal miners.** Continue consultation and collaboration with the GDRC officials to ensure that the realities of artisanal miners are reflected in forthcoming mining rules and regulations.
- **Articulate a national gold strategy.** Drawing on the recommendations from the October 2018 ASM Gold Workshop, GDRC needs to articulate a clear strategy for ASM gold that reduces and synchronizes taxes, controls fraud and smuggling, and ensures support from the MoM for pilot supply chains.

KEY PRODUCTS

ICGLR Organizational and Financial Management Needs Assessment (March 2015).

A Rights-Based Approach to Legal and Policy Reform in the DRC Mining Sector: Findings from Scoping Trips & Roundtable Discussions (April 2015).

Analyse Juridique Des Politiques Et Des Reglements Miniers de la RDC (Legal & Policy Analysis of the DRC's Mining Policies, Codes and Regulations) (July 2015).

The Regional Certification Mechanism of the International Conference of The Great Lakes: Evaluation and Recommendations (July 2016).

Supply Chain Systems Evaluation: The Democratic Republic of Congo (DRC) Critical Assessment of the Tracking Mechanisms Deployed on Congolese Supply Chains: The Case of Société Aurifère du Kivu et du Maniema (SAKIMA) [also known as the IMCA Report] (March 2017).

15 Legal Decrees Establishing Artisanal Mining Zones (ZEAs) issued from the Ministry of Mines, DRC (2018). [Available upon request from MoM.]

Our Impact

“CBRMT's support of the ICGLR third-party audits was critically important as it allowed the Audit Committee to understand what it takes to develop and manage an audit program credible to global markets...These audits created the opportunity to develop a strategic capacity building program on audit process and reporting for the Audit Committee.”



Michael Loch

ICGLR Audit Committee Member
President and CEO, Responsible Sourcing LLC



OUR
WORK

2. CAPACITY BUILDING

INSTITUTIONS AND SYSTEMS STRENGTHENED

CBRMT developed and delivered a suite of 20 training modules based on needs assessments of mining cooperatives and government mining services. The training modules focused on a wide range of capacity-building topics, including improving governance, administration, and accounting procedures for mining cooperatives; the principles of due diligence, traceability, and risk mitigation; gender awareness; health and safety; conflict resolution; and environmental impacts. The modules incorporated a variety of training techniques that include participatory theater, field-based exercises, focus groups, coaching, and workshops and reached a total of 2,699 beneficiaries.

BACKGROUND

CBRMT primarily trained mining cooperatives, members of GDRC mining services, and miners active in CBRMT-supported supply chains with the objective of strengthening the capacities of key players in conflict-free mineral supply chains. CBRMT's initial design strongly emphasized partnership with the GDRC. With time, the emphasis shifted to focus more on mining cooperatives where the project was establishing responsible supply chains. Each subset of actors presented a unique set of needs and challenges, as described in this section. A Capacity Building and Training Strategy guided this work, calling for tailored training modules delivered using a combination of classroom-based training, site visits, collaborative learning, hands-on skill building, coaching, and consulting. The strategy guided the development and execution of 20 training modules that were ultimately compiled in a training compendium and distributed to partners. CBRMT trained 2,699 people over the life of the project (beginning in July 2014) in the provinces of North and South Kivu, and Maniema. The trainings reached beneficiaries in 35 mining cooperatives, the DRC MoM staff at the provincial and national levels, and civil society.

PARTNER SELECTION AND CAPACITY ASSESSMENTS

CBRMT's capacity building efforts began by adapting a functional organizational capacity assessment tool to assess cooperatives' training needs based on their organizational and institutional capacity. The project team then selected 35 cooperatives in North Kivu, South Kivu, and Maniema who demonstrated a minimum level of organizational, human and financial capacity, and commitment to responsible sourcing.

In respect to its GDRC counterparts, CBRMT also conducted an organizational needs assessment for two divisions within the MoM—the Center for Evaluation, Expertise, and Certification (Centre d'Expertise, d'Évaluation et de Certification) (CEEC) and the Provincial Division of Mines. The needs



35
mining
cooperatives
trained

2,699
people trained
over the life of
the project

290
people trained in
alternative
livelihood
strategies

100%
of female
participants better
understood rights

20
training modules
developed

assessment focused on each organization's ability to support validation and traceability schemes as well as its capacity to support the scaling up of conflict-free minerals supply chains from the DRC.

In 2017, CBRMT shifted its emphasis away from GDRC state actors, centering more on the men and women affiliated with mining cooperatives at artisanal mine sites. One barrier to reaching the artisanal miners themselves is the structure and function of mining cooperatives in the DRC, which are sometimes referred to as “patron cooperatives,” as they are effectively led by a powerful individual and rarely, if ever, are truly representative of the workers themselves. CBRMT sought to reach the miners by designing some training sessions specifically for them and delivering the sessions at the mine site level in the local language using applied methodologies to provide the miners with an opportunity to practice their newly acquired skills. CBRMT also completed an internal assessment of our capacity-building approach based on interviews with 162 members of five cooperatives in North and South Kivu.

MINING COOPERATIVES

As mentioned above, DRC mining cooperatives are established and managed by powerful elites, largely for their own benefit. The miners work at the behest of the cooperative's leadership and do not necessarily have any control over their working conditions or the structure and function of the cooperative. On the whole, cooperative technical and management capacity is quite low, with a large number of cooperatives holding the requisite paperwork, but ineffectively managing their mines or miners. At the same time, by Congolese law, artisanal mining can take place only under the auspices of a cooperative. As a result, CBRMT was required to design training for mining cooperatives, which often meant not for the miners, but for leaders whose priorities did not always involve the best interests of the miners. CBRMT's approach to this training was to help cooperative leaders understand their specific role in a responsible mineral chain, improve their accountability to their membership, strengthen their administration and governance capabilities, and increase their conflict resolution skills.

CBRMT built the capacities of 35 mining cooperatives to establish an RMT using a suite of 20 tailored training modules designed to improve the management, efficiency, and transparency of mineral supply chains. The modules address a broad range of topics, including improving mining cooperative governance, administration, and budgeting; introducing the principles of due diligence; technical training to implement traceability systems; and tailored workshops that address issues related to gender, health and safety, conflict resolution, and incident monitoring. Training methods included formal workshops, field-based exercises, role plays, coaching, participatory theater as well as drawings for low-literacy audiences. CBRMT also produced portable poster boards with key messages in French and Swahili focusing on due diligence, gender, and land tenure and property rights at artisanal mine sites.

Finally, all training and technical assistance addressed gender-differentiated aspects of artisanal mining to ensure that men and women have an equal opportunity to engage with and benefit from CBRMT's assistance. The trainings also addressed the issue of sexual and gender-based violence through raising awareness about the rights, and risks of women operating in and around artisanal mine sites. The modules contained practical examples and exercises to ensure cooperative leadership and members had

the knowledge and tools to more effectively and democratically manage their cooperatives. Capacity-building work with cooperatives underscores the importance of integrating a “Do No Harm” approach into project activities. For instance, a training in cooperative governance in Nyamurhale prompted the cooperative’s leadership to drive out powerful “middle men,” who were undermining the cooperative’s activities.

ARTISANAL MINERS

The World Bank estimates that a *minimum* of 1.5 million men and women in the DRC rely directly on artisanal mining as a significant source of their income¹. Many are displaced from conflict-affected areas and have no other means of making a livelihood. As a group, miners suffer from a high rate of illiteracy, are extremely poor, are exposed to significant safety and security risks, and earn very little in return for their hard labor. As described earlier, the relationship between miners and cooperative leaders is complex. In some instances, miners receive technical assistance and a minimal amount of mining equipment from the cooperative; in other cases, while the miners often have to pay taxes to their cooperatives, they receive very little in return.

CBRMT sought to train miners directly on the topics most important to them using hands-on approaches to increase recovery, reduce environmental risk, and increase health and safety (see Figure 2). In an attempt to help miners increase their earnings, CBRMT hired an artisanal mining and geoscience expert to provide Nyamurhale gold miners with hands-on technical training to improve their production (see <https://tetratechintdev.exposure.co/stopping-the-flow>). The consultant used locally replicable gold concentration techniques to demonstrate to the miners ways to improve their rates of recovery by building and operating gravity concentration equipment. Miners learned how to build a simple “Z sluice” out of wood and specialized gold concentrating carpets that trap the gold and heavy minerals more effectively, while allowing lighter minerals to flow down into a tailings pond below. Demonstrations showed how significant amounts of gold could be extracted from ore that had already been processed several times. While the training generated considerable interest among the miners, many of them were reluctant to adopt the innovative technologies because they perceived them as potentially eliminating the need for fellow workers (crushers and grinders) with whom they had long, established relationships. The technologies also undermined tactics to hold onto undeclared mineralized sand for recovering minerals at a later time.

Sadly, artisanal mining areas are well known sites for landslides and other mine safety hazards, which often are the result of a lack of education and preventive measures. To address these risks, CBRMT partnered with the Red Cross to provide health and safety training in Rubaya (North Kivu), Matete (Maniema), and Nyamurhale and Numbi (South Kivu). These trainings included administering first aid and

ADULT LEARNING
Innovative Approaches to Training Low-Literacy Audiences

Hands-on demonstrations: Red Cross demonstrated emergency response measures in the event of a mine site accident.

Images: Artist-rendered drawings were used in trainings in lieu of written material.

Signboards: Large signboards were placed at mine sites to convey key messages such as the importance of keeping children out of mines (See Figure 4)

Coaching: One-on-one coaching helped cooperative leaders troubleshoot challenges.

Participatory theater: Women’s role in the mining sector was the focus of a series of participatory theater plays, which facilitated important communitywide dialogue. A video of the plays was subsequently presented in other communities, increasing its impact.

Figure 2. Adult Learning Methods used by CBRMT.

¹ World Bank (2010). Project Appraisal Document. The Democratic Republic Of Congo For A Growth With Governance In The Mineral Sector Technical Assistance Project

triaging critical patients. CBRMT also trained miners in methods for identifying, mitigating and responding to environmental health and safety risks, including having miners walk through their site to identify potential environmental hazards and then agreeing on strategies to reduce those risks. For example, miners agreed to close exhausted mine pits, filling them with rocks and then cordoning them off with tape.



Figure 3. Miners meeting in Nyamurhale South Kivu to discuss safety concerns. Photo credit: StoryUP.

DRC MINING SERVICES

DRC's official mining services include the CEEC, Provincial Division of Mines, and Service for Assistance and Supervision of Artisanal and Small-Scale Mining (Le Service d'Assistance et d'Encadrement de l'Exploitation Minière Artisanale et de la Petite Echelle) (SAEMAPE). Initial scoping trips to ASM sites in North Kivu, South Kivu, Maniema and Katanga provinces made it clear the capacity of these services at the mine-site level are generally quite low. Based on the results from the capacity assessment of the MoM (see Partner Selection and Capacity Assessments, p.11), CBRMT developed an Organizational Capacity Building Plan for the CEEC and Division of Mines. The plan specifies the requisite skills, training, human resources and behavior changes needed within these organizations to effectively support a sustained expansion (e.g. scaling up) of existing and additional traceability and certification systems. A series of training modules was developed to address these deficiencies and support the scaling up of an additional traceability system for the 3Ts. Training modules focus on traceability, due diligence (including

risk identification and mitigation), and the role of clear and secure resource rights as a means of reducing conflict at artisanal mine sites.

CBRMT focused on topics for DRC mining officials at the provincial level, including the fundamentals of due diligence, property rights, and conflict resolution, and their role within a responsible supply chain. Our objective in increasing their awareness and capacity was to enable them to manage more responsible, efficient, effective, and transparent mineral supply chains.

CBRMT also trained personnel of the Division of Mines and SAEMAPE in North Kivu, South Kivu, and Maniema in environmental management, cooperative management, health and safety, and due diligence and traceability. A Training-of-Trainers model was adopted, in which CBRMT trained Division of Mines and SAEMAPE staff first as trainers and then had them accompany the Field Training Coordinator to co-deliver trainings in the field. At the end of the project, the project team provided all GDRC counterparts with a hard copy of the compendium of modules and a copy of a “Boite d’Image,” visual representations of trainings that can be provided for low-literacy audiences (see Figure 4 below).

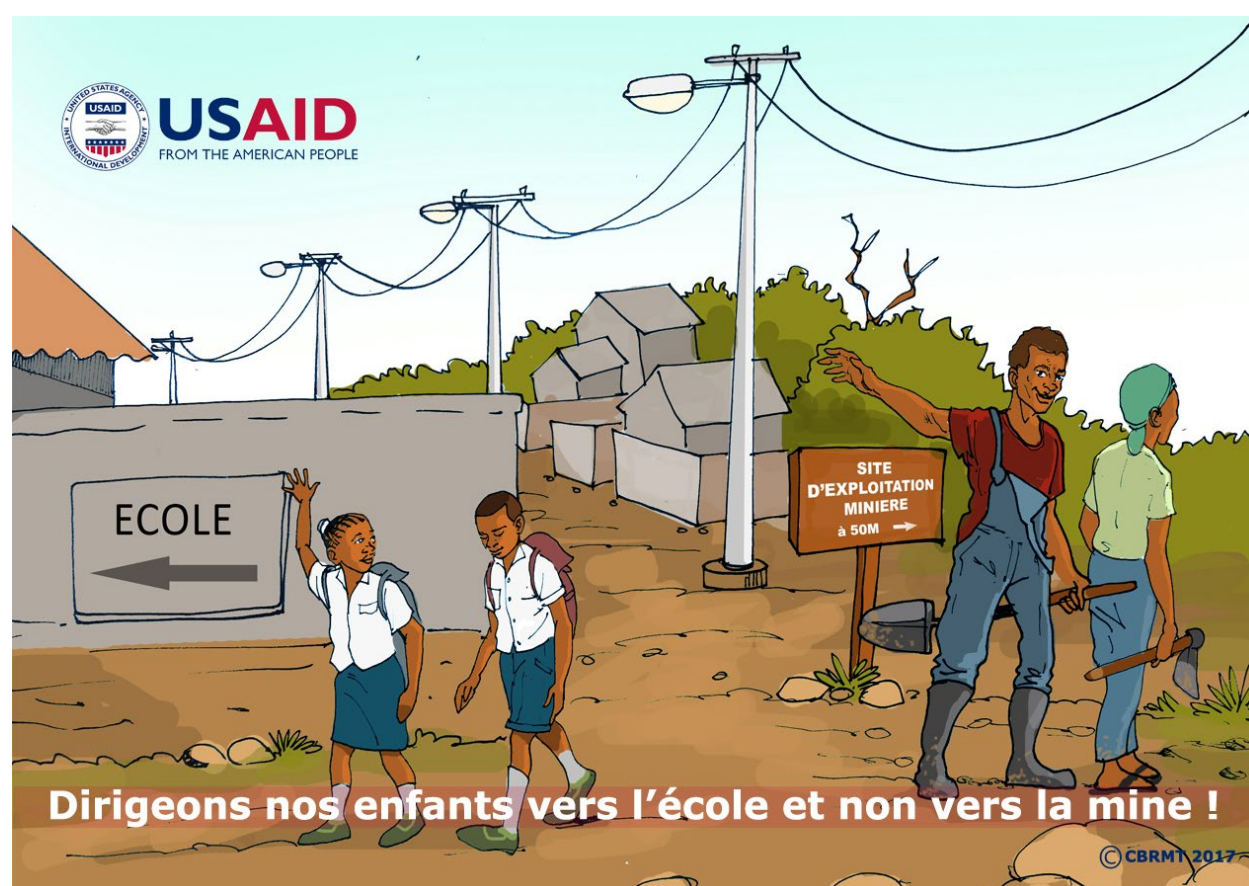


Figure 4. An example from the “Boite d’Image” used to train miners on topics such as child labor. Translation: “Encourage our children to go to school and not to the mine!”

Over the course of the project, CBRMT also encountered systemic challenges related to training government mining officials. For example, many of the DRC mining services agents placed in the most remote environments are often not paid on time or at all. This situation increases the potential for corruption, fraud and smuggling. For example, in some instances, DRC agents may exact extra-legal “taxes” on minerals to help cover their own expenses. In addition, many mining services agents expected CBRMT to contribute to their pay, demanding incentives to do their work. Finally, once DRC

officials were trained in a new skill or technique, they often had no transportation or means to conduct field visits.

MOVING FORWARD: Strengthening the capacity of key actors to implement responsible supply chains would benefit from the following recommendations:

- **Encourage the GDRC to commit the necessary resources** for mining services. Government agents require legal financial compensation (salaries) to carry out their mandates to support responsible supply chains.
- **Continue to use CBRMT-developed materials to increase capacity.** The cooperatives, civil society organizations, and governmental partners who were trained by CBRMT and received the supporting materials are encouraged to use these materials to continue reinforcing capacity by sharing their skills.
- **Explain the rationale behind trainings to gain buy-in.** Sensitize the artisanal miners and cooperatives on the value of trainings that could ultimately help them increase their production and their material well-being.
- **Focus efforts on a smaller number of participants.** CBRMT's high targets for number of training participants meant that, in many cases, training courses were one-off events, without the follow-up and requisite support necessary to ensure that participants were able to properly apply their new skills.
- **Consider provision of limited infrastructure support.** If possible, provide limited infrastructure support to reinforce pits to reduce the risk of incidents, or to build latrines in and around the mine site to prevent disease and other health problems.
- **Provide cooperatives with technical support on gold price calculations.** Include the methods used to determine them.
- **Use a thorough process and objective criteria for selecting cooperatives** for responsible supply chains. Assess the cooperative's organizational, human, and financial capacity.
- **Do no harm.** Trainings in mining governance should include a discussion of potential risks of organizational change so cooperatives can carefully weigh potential risks and benefits before making decisions that could affect the supply chain.

KEY PRODUCTS

Functional Organizational Plan & Support for Traceability, Due Diligence and Certification Initiatives in the DRC [Capacity Assessment of SAEMAPE and Administration des Mines] (July 2015)

CBRMT Capacity Building and Training Plan: March 2016–June 2017 (includes Capacity Assessment Questionnaire)

Recueil Des Modules De Formation ASM [Compendium of 20 ASM Training Modules]. (June 2016)

Participatory Theatre Video (October 2016)

Our Impact

“Now we know how to work more efficiently. We know how many miners have arrived at the site, where they are working, and how to protect our miners and their pits. This will change our lives, and we know our lives will improve.”



Alain Chabigega Hamuli ‘Muzungu’
Miner, Nyamurhale Mine



3.1. TIN, TANTULUM, AND TUNGSTEN

DUE DILIGENCE AND TRACEABILITY SYSTEMS

OUR WORK

CBRMT established due diligence and traceability systems across 129 individual mine sites in Eastern DRC to enable international end users to purchase conflict-free 3Ts. We successfully tested new approaches and technologies, including on-site due diligence monitoring, real-time digital data dissemination via dashboards, and risk-based incident scoring. A total of 4,471 miners worked at mine sites where due diligence systems were implemented, promoting cost efficiencies, increasing transparency, strengthening local capacity, and establishing the foundations for future responsible sourcing.

BACKGROUND

Prior to 2014, the only system tracing the 3Ts in the DRC was the International Tin Research Institute Tin Supply Chain Initiative (iTSCi), which was put in place by the International Tin Association (formerly known as the International Tin Research Institute [ITRI]). A core element of CBRMT's original contract was to scale up existing systems and introduce an *additional* due diligence and traceability system for the 3Ts in the DRC to expand the number of sites being monitored, encourage greater cost efficiencies, and demonstrate improvements in transparency and credibility.

The project intended to award subcontracts to Pact and the BSP for this purpose. But, after months of negotiation, PACT's contractual relationship with ITRI and use of the iTSCi traceability program significantly restricted PACT's ability to fulfill a role consistent with the purpose and scope of the CBRMT activity. As a result, USAID requested that negotiations be terminated, and PACT was informed of this decision on February 9, 2015.

Despite this early setback, CBRMT remained committed to establishing an additional traceability system for the 3Ts in the DRC. From 2014 to 2018, CBRMT supported BSP to establish a new due diligence and traceability service in the DRC that would be effective, credible, robust, transparent, and cost-effective. As outlined in the timeline (see Figure 8), the path towards establishing the BSP system at new mine sites was marked by both milestones and challenges. Challenges included interferences by the existing system; the lack of formal agreements between different local stakeholders (e.g., mine titleholder, mining operator, and exporter); insufficient capital raised by mining operators; and security problems that included armed groups being present at mine sites.

Despite these setbacks, CBRMT was able to achieve some important milestones in collaboration with our partner BSP. They include tracing 23 tons of tin from the mine site to the exporter; written confirmation by the GDRC that BSP and iTSCi should co-exist; demonstrated proof of concept that an

additional due diligence and traceability system can credibly operate with greater cost efficiency; deployment and continuous development of databases, dashboards, monitoring methodology, incident scoring, and mitigation actions; and awareness being raised among miners and cooperatives about their importance within international supply chains.

BASELINE ASSESSMENT

In preparation for establishing an alternative due diligence and traceability platform, CBRMT first completed an independent and peer-reviewed assessment of existing and planned 3T traceability schemes in the DRC in October 2014. The assessment provided a comparative analysis of eight tracking, tracing, due diligence, and certification schemes; identified implementation challenges; and provided recommendations for improvements related to the scaling up of existing and alternative chain of custody and due diligence systems in the DRC. These findings were then used to inform CBRMT's technical approach to establishing an additional 3T traceability system in the DRC. The key principles underpinning CBRMT's technical approach to our work in 3Ts due diligence and traceability are highlighted in Figure 5.

Key Principles of 3Ts Technical Approach
<p>Support Clear and Secure Property and Resource Rights to strengthen legal chains of custody and end ambiguous or open-access tenure arrangements.</p> <p>Leverage Private Sector Engagement to address ASM/LSM cohabitation and the formalization of artisanal mining on large-scale concessions.</p> <p>Public Awareness and Communication to explain the basic principles and functions that form the foundations of an RMT.</p> <p>Leverage, Complement, and/or Add Value to Existing Efforts to avoid duplication, encourage healthy competition, synergize activities, and maximize impact.</p> <p>Implement Risk Management and Mitigation Measures by ensuring interventions are inclusive, sensitive, and rights-based and make use of local conflict-dispute mechanisms.</p> <p>Clarify and Strengthen the Rights and Roles of Women in the ASM Sector by ensuring activities are designed and implemented to assess, engage, empower, and monitor the effective promotion of women's rights.</p>

Figure 5. Key Principles of 3Ts Technical Approach

IMPLEMENTATION OF DUE DILIGENCE MONITORING AND TRACEABILITY

CBRMT established diligence and/or traceability systems across nine mining areas in North Kivu, South Kivu, and Maniema through a five-step process:

- (1) Site selection
- (2) Capacity building
- (3) Testing
- (4) Adaptation
- (5) Sustainability

Unfortunately, for the reasons explained below, none of these 3T supply chains succeeded in exporting minerals from the DRC. Nonetheless, important milestones were achieved, and key lessons learned. This section provides summaries for the mining areas in which CBRMT invested significant resources. See annex C for a comprehensive map of the coverage of BSP's due diligence and traceability systems.



Piloted new
traceability & due
diligence system

4,471

miners worked at
sites with due
diligence systems

1,119

incidents
recorded as a
result of on-site
monitoring

23

tons of conflict-
free tin traced

129

3T mine sites with
due diligence
systems

MWEMA (2016–2017)

Located in south-central Maniema, the Mwema mining area is primarily comprised of mine sites located on a title held by Belair Maniema, a Canadian company that also is the buyer of the minerals. BSP began initiating deployment of its due diligence systems following a successful qualification mission and publication of the Qualification Decree, which validated 10 mine sites. BSP's traceability launch took place on November 11, 2016, after the publication of the *Arrêté de Qualification*. In total **1,251 kilograms of tin were traced from two mine sites in Mwema** to Belair's warehouse.

Political instability and the absence of Belair staff significantly lowered production volumes in December 2016. In early 2017, tagging on-site was largely suspended due to the absence of Belair personnel and a lack of funding to support its activities. Ultimately Belair also faced a need for more production volume and decided to add the Kalima mine site, which was under iTSCi tagging, to their supply chain. In agreement with their international buyer, Belair then decided to exclusively use the iTSCi traceability system to expedite their logistics and documentation of the shipment.

NUMBI (2016–2017)

The Numbi mining area was historically the site of widespread violence during the Second Congo War (1998–2003) and served as a refuge for Mai Mai and other armed groups that routinely used proceeds from the mineral trade to fund their rebellion. The complex dynamics of the local mineral trade, combined with regional politics and violence, plagued the area for years. By 2012, however, armed groups' control over the mining area had declined significantly and government services were established to monitor mining activities. In 2014, BSP selected Numbi as one of the first pilot sites to deploy due diligence and traceability as an alternative to the iTSCi system. Testing of the traceability solution (GeoTraceability) began at Numbi in June 2015 (as pictured in Figure 6).

BSP maintained direct communication and close collaboration with Numbi cooperatives and local authorities for 2.5 years—regularly providing support, consultation, and compliance recommendations. Long negotiations eventually led to the signature of a Memorandum of Understanding (MOU) with the mine titleholder and an international trader. In April 2015, the first eight mine sites at Numbi were qualified as conflict-free, and BSP began collecting baseline data and due diligence monitoring shortly thereafter, recording 160 separate incidents over time. A test of the traceability system was conducted in June 2015, in spite of interference by iTSCi agents. Between 2016 and 2017, BSP tried unsuccessfully to broker commercial agreements between the cooperative, titleholder, and numerous exporters and receiving smelters.

Ultimately, a range of factors prevented BSP from establishing a permanent due diligence and traceability system at Numbi, including commercial challenges in brokering agreements between all parties, fear of retaliation by iTSCi among commercial partners, limited acceptance and knowledge about the BSP system by receiving smelters, and interference by iTSCi at the site itself. For example, when BSP first approached a smelter in 2015, they stated they would not take delivery of BSP material as it would be too complicated to adjust to a new system, despite the fact that BSP could deliver traceability data in the same format as iTSCi. The

smelter's position towards BSP over the years remained largely unchanged, and, because it is one of the largest tin smelters procuring from the DRC, this presented a major impediment. Monitoring ended at Numbi in late 2017. A key lesson learned from Numbi was the need to complete a market study and a commercial feasibility assessment for the entire supply chain, from mine to market, prior to implementation.



Figure 6. A cooperative member testing the traceability system at Numbi. Photo credit: CBRMT.

KACHUBA (2017–2018)

Located in western Kabare territory, Kachuba is a productive tin mine located on top of a steep hill, 75 kilometers from Bukavu. BSP began by engaging with the mine titleholder, Congo Eco Project, and the COMIDEA cooperative to plan for legalization of mining activities. BSP also introduced the titleholder and cooperative to the international trader, Noviva/CJX, and brokered a formal commercial agreement. The tripartite MOU between the parties was developed by BSP and signed on July 27, 2017. Extensive training was then conducted with the cooperative, and discussions were held to qualify the site as a way of preventing supply chain contamination and contributing to local peace and stability. Following the successful validation of the Kachuba mine sites in mid-December 2017, BSP immediately launched a traceability system and continued conducting due diligence monitoring on-site with field monitors. The first minerals from Kachuba were traced and tagged on December 29, 2017.

Over the course of the project, **23 tons of tin were successfully traced from Kachuba** and stored at the CJX warehouse in Bukavu. Unfortunately progress at this site, including the planned export of the minerals, was halted when iTSCi raised a red flag incident that they refused to close despite clarification by BSP of the incident in question and a positive meeting with the National Minister of Mines. The economic pressure on CJX proved to be too great, and CJX informed BSP in March 2018 they were

leaving the site due to the delay in the closure of the iTSCi incident and poor production volumes. In late May, a Mai Mai armed group attacked the site but was repelled by the Armed Forces of the Democratic Republic of the Congo (Forces Armées de la République Démocratique du Congo). Following that attack, CBRMT, in consultation with USAID, decided to end activities at Kachuba and the BSP monitor left the site on May 31, 2018.

WALIKALE (2018)

In 2018, CBRMT identified Walikale territory as a priority area for BSP deployment, starting with due diligence monitoring with the goal of eventually adding traceability services. Working in collaboration with the industrial tin miner, Alphamin Bisie Mining (ABM), a baseline assessment was conducted of mine sites occupied by miners who previously worked illegally at the ABM concession. The assessment recommended that due diligence monitoring first be initiated at the Kalay Boeing mine site because of its commercial viability (it produces 20–30 tons of tin per month). CBRMT subsequently organized several meetings with ABM, the North Kivu MoM, the Chamber of Commerce, and several exporters operating at Kalay Boeing to discuss the advantages of the BSP system, including cost-competitiveness, greater transparency, and real-time access to monitoring data. The group also discussed the ability to tailor the due diligence system to support exporter compliance with the U.S. Dodd-Frank Act and European Union conflict minerals regulations.

On June 14, 2018, BSP trained and deployed a full-time monitor to Kalay Boeing. To date, 181 incidents have been recorded at the mine and uploaded to the dashboard, 61 percent of which were related to legality and safety, including miners working at night, illegal taxation by state agents, theft of minerals, and injuries due to landslides and falling rocks/stones, as well as high levels of consumption of drugs and alcohol. The theft of iTSCi traceability tags and the absence of state agents were also reported.

Monitoring continued at Kalay Boeing through December 2018, despite challenging conditions that included the absence of cellular and internet service on-site, requiring the monitor to make a four-hour weekly trek to Logu to upload data. Due diligence measures are, however, having a positive impact. Traceability tags are now stored in a secure location to address the issues related to legality, and officials are making efforts to enforce the regulation against working at night. To reduce the risk of landslides, mining pit managers have closed some pits and are required to secure them before reopening. The cooperative has also issued warnings about pit safety, and the Administration of Mines has prohibited the use of alcohol and drugs to reduce safety risks. These mitigation measures by DRC officials and the cooperative are a positive sign, as is the continuing decline in the frequency of incidents, which might be attributable to the presence of due diligence monitoring.

Looking to the future, all four exporters currently operating at or near Kalay Boeing are selling their minerals to a large smelter with close ties to the iTSCi system. As a result, deployment of an additional traceability system at Kalay Boeing stalled in late 2018. Any further progress will be contingent upon the smelter accepting BSP.

DEVELOPMENT OF INNOVATIVE TOOLS AND SYSTEMS

A signature feature of CBRMT's work was the development of an innovative digital, trustworthy, transparent, and evidence-based due diligence and traceability system at ASM sites in the DRC. A dynamic, continuous data collection system at mining-area level was deployed at 3T sites in the form of the BSP monitoring and GeoTraceability system. This traceability system ensured data availability ahead of export, and information reporting procedures enabled access to all required due diligence data by international supply chain participants. The traceability system was also adapted as needed to reflect circumstances of the local trade.

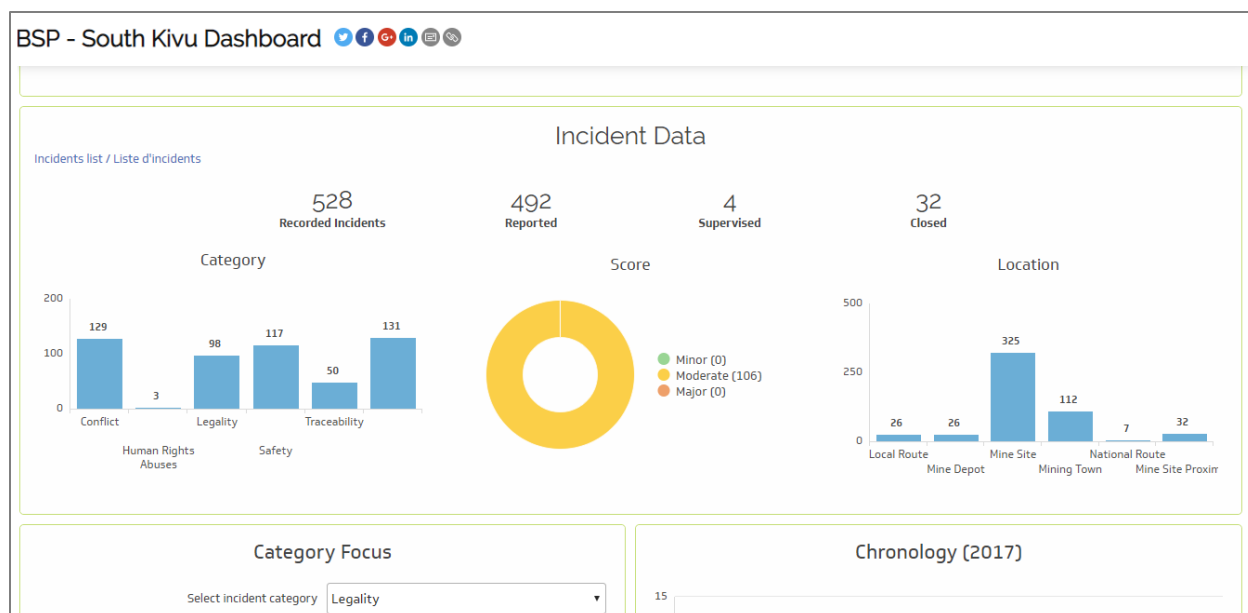


Figure 7. BSP dashboard demonstrating incidents by type and location in South Kivu

Other notable innovations include the development of an online dashboard (see Figure 7 above) that displays real-time data to allow for automatic updating and efficient information flow, a Serious Incidents Alerting Mechanism, aimed at communicating directly to affected stakeholders—within 48 working hours—the most serious types of incidents reported through the monitoring system. Finally, a Risk Management Protocol, which was partially funded by the RMI, linked BSP incidents to risk categories and best practice risk mitigation based on literature review and stakeholder feedback.

MOVING FORWARD: CBRMT faced numerous challenges in establishing responsible supply chains in the 3T sector, including consistent interference and negative pressure from iTSCi on commercial operators; competition between different Congolese state agencies as well as competition or discord at the local, provincial, and national levels; strict requirements that made illegal markets more commercially attractive to exporters; acceptance by smelters and local operators of BSP-validated materials; and insufficient support from the GDRC for the BSP system.

CBRMT recommends that future activities in the 3T sector by USAID alone, or in coordination with other partners in the 3T sector, should include the following:

- **Undertake baseline research before implementing any interventions.** Projects should take the time to conduct in-depth baseline assessments to better understand the operating context of a mine site (social, political, economic, and cultural) before making an intervention. Interventions that might appear technically sound can often have unintended negative consequences or fail to be adopted if this social, cultural, and political context is not well understood.
- **Demonstrate proof of concept before scaling up.** The original contract targeted a high number of mine sites rather than first developing a proof of concept at any single supply chain. Future projects should be designed to first prove the concept before seeking to scale responsible due diligence and/or traceability systems.
- **Be flexible and adaptive.** CBRMT learned firsthand the need to be adaptive and flexible when establishing responsible mineral supply chains. The fluctuating security situation in eastern DRC compounded by the ever-changing market dynamics often necessitate investing in more than one

site. Projects should consistently assess risks and be prepared to work at alternate sites as needed and be nimble enough to shift locations if needed.

- **Secure buy-in from all key stakeholders across the supply chain.** Make sure all stakeholders have accepted implementation of the traceability and due diligence system.
- **Pair due diligence monitoring with an incident management plan to mitigate identified risks and incidents.** Reporting incidents is not enough; responsible supply chains must also put in place procedures to monitor open and incidents, if possible.
- **Assess commercial viability.** Undertake a market study and commercial feasibility assessment for the entire supply chain, from mine to market, prior to deciding on an area for implementation.
- **Set realistic requirements.** Adopt realistic and progressive requirements and criteria suited to an artisanal mining context. Introduce entry-level due diligence products to local stakeholders to prepare them ahead of engagement with an exporter. Over time, and with significant capacity-building efforts, due diligence providers can progressively add more complex systems that address strict due diligence requirements.
- **Communicate.** Participation in international conferences, organizing public webinars, curating a blog, use of social media, and films are all tools that should be regularly used to communicate successes and challenges.
- **Support scaling up.** Continue to BSP's progress in its efforts to expand its traceability and due diligence systems, while ensuring a sustainable business model.

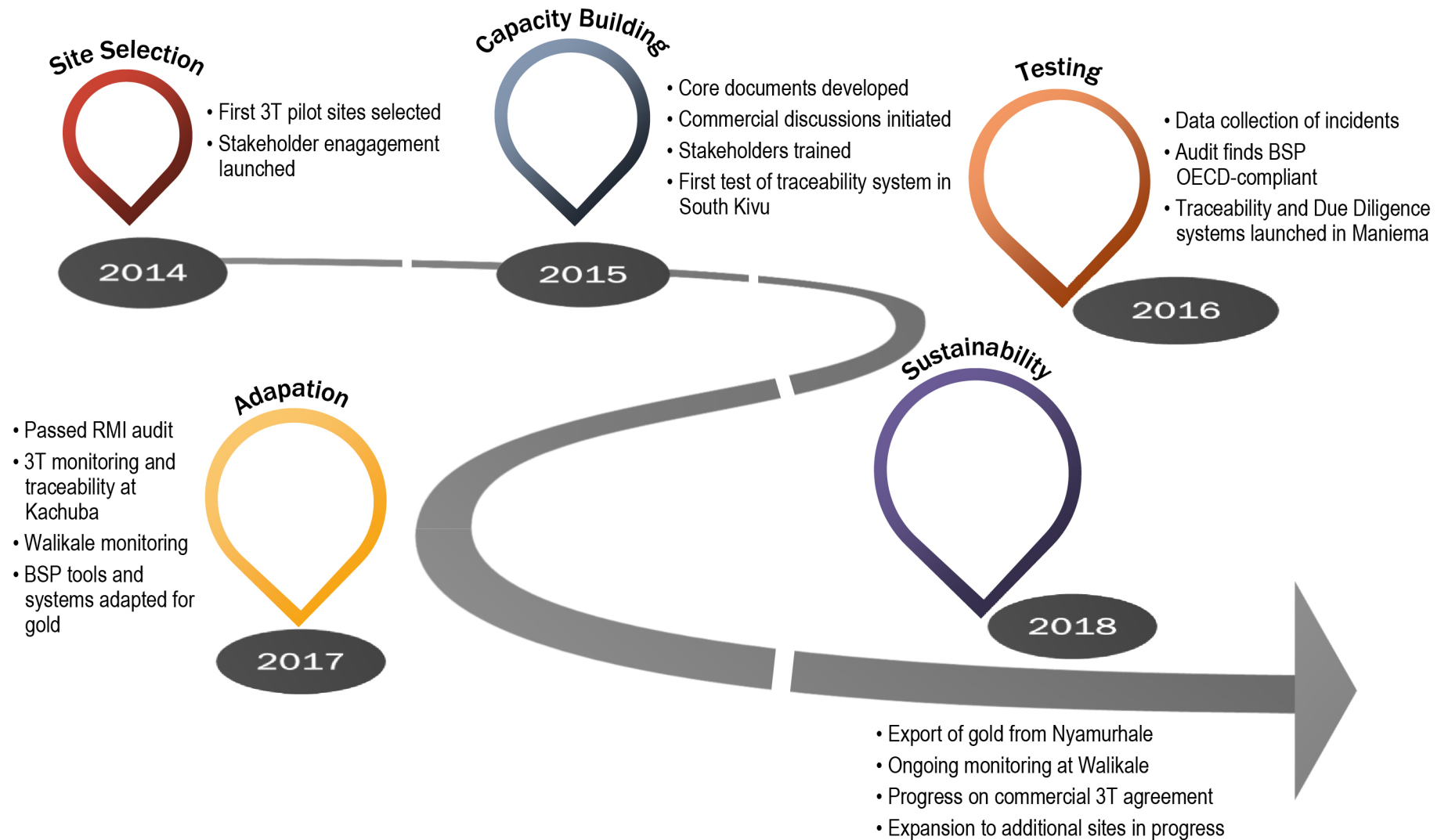
KEY PRODUCTS

Scaling-Up Due Diligence and Traceability Systems for Tin, Tantalum, and Tungsten (April 2016)

Walikale Due Diligence Dashboard (2018). [Available upon request from BSP.]

Kachuba / Lemera Dashboard (2018). [Available upon request from BSP.]

Figure 8. Responsible Mineral Supply Chain Milestones



Our Impact

“BSP provides technical advice and helps the participating mining companies close any gaps in due diligence management systems and respond to identified risks.”



**Public Due Diligence Report for
Responsible Minerals Sourcing**
Thailand Smelting & Refining Co, Ltd.



3.2. GOLD

RESPONSIBLE ARTISANAL GOLD

CBRMT worked over the course of the project at multiple gold mine sites in three provinces in collaboration with our partners to demonstrate proof of concept that responsible artisanal gold can be extracted, traded, and exported from the DRC. Our work included conducting extensive baseline studies, technical interventions, developing innovative tools to support responsible sourcing, establishing due diligence and traceability systems, and extensive capacity building. Key outcomes include the first export of conflict-free gold from South Kivu to a London Bullion Market Association (LBMA) good delivery refiner; the piloting of DRC's gold traceability system; and increased engagement across governments, the private sector, and civil society in support of responsible gold.

BACKGROUND

According to the United Nations Group of Experts and other reports, at least 97 percent of the DRC's current artisanal gold production is untaxed at export and illegally smuggled out of the country. Artisanal gold also serves as a significant source of revenue for armed groups and militias. The absence of a legal and well-regulated artisanal gold sector results in millions of dollars in lost revenues annually for the DRC government, while also contributing to regional instability. Miners and traders of artisanal gold have little-to-no incentive to act in a lawful manner because of unfavorable tax structures, limited proven traceability systems for gold in country, limited capacity to conduct monitoring oversight and due diligence, and a limited number of buyers willing to legally purchase and export artisanal gold from the DRC.

CBRMT established several responsible gold pilot sites in eastern DRC, which were designed to test the application of different gold traceability and due diligence assurance systems. In doing so the project faced a number of challenges, including: addressing the requirements and concerns of downstream partners regarding sourcing from the DRC; identifying a reliable exporter that met due diligence requirements; and improving the limited financial, operational, and technical management capacity among partner cooperatives and government officials.

Despite these challenges, CBRMT achieved the first export of verified, conflict-free gold from South Kivu to the United States—a major milestone for all the stakeholders involved. The gold was traced using both the ITOA and GeoTraceability systems and delivered to downstream partners Richline, the Asahi refinery, and Signet Jewelers. This export represents the first supply chain-to-source conflict-free artisanal gold from the DRC by a U.S.-listed company since enactment of the Dodd-Frank Act, and the first export for the ITOA traceability system. Other milestones achieved over the course of the project

include the official registration of 263 miners at Nyamurhale, creation of an equipment rental pool for miners, the first pilot and evaluation of the ITOA traceability system, the adaptation of BSP's online Dashboards for gold, and implementation of numerous mitigation measures to prevent the presence of children at the Nyamurhale site.

DESIGN AND SITE SELECTION

Exporters Workshop

In late February 2015, CBRMT, in collaboration with the MoM and BGR, convened a two-day workshop in Kinshasa with approximately 90 stakeholders from the ASM gold sector in attendance. Participants included senior GDRC officials, international technical experts, traders, large-scale mining (LSM) actors, donors, and traceability providers. Discussions focused on the demand for responsibly sourced artisanal gold from the DRC, opportunities and barriers that the ASM gold sector currently faces, avenues for stakeholder collaboration, potential traceability solutions, and lessons learned from previous mineral sourcing programs. The workshop not only produced valuable feedback, which informed the design and implementation of our approach, but also revealed significant government support for the responsible sourcing of artisanal gold and the urgent desire to start as soon as possible. CBRMT convened a consultative session with gold experts from non-government organizations, DRC mining services, private sector partners, and traceability providers from the Great Lakes region to agree upon criteria for responsible gold supply chains (see Figure 9).

Research

International gold expert Shawn Blore analyzed gold supply chains to determine how to promote responsible conflict-free sourcing of gold and apply due diligence consistent with international best practices. Blore's study aimed to capture best practices, lessons learned, and opportunities for alignment based on similar international systems through a review of responsibly mined gold around the world; meetings with existing ASM gold pilot projects and large-scale industrial gold operators in the DRC; and assessments of the efficacy, cost, transparency, credibility, and sustainability of existing efforts to promote responsible conflict-free sourcing of artisanal gold from the DRC. The study report—*Working with Producers to Responsible Source Artisanal Gold from the DRC*—suggests a combination of government incentives, the development of effective traceability measures, and other localized incentives incorporated into pilot projects to bring DRC artisanal gold back into legal channels. Blore also identifies likely locations where pilot projects could be initiated; provides implementation recommendations on the structure, timing, and sequencing of a gold pilot; identifies key stakeholders with whom CBRMT would need to coordinate interventions; points to additional research needs; and suggests themes for regional- and national-level workshops.

Accessibility: Sites must be accessible in on day maximum from a trade center.

Mineral rights: Site must be green validated, free of title and on a ZEA, or the cooperative must develop an agreement with title holder.

Cooperative registration and structures: The miners working on site, must be managed by a legally registered cooperative.

Security: The perimeter of the site must show a certain level of security and not to close to an armed group activity or is under a responsibility of FARDC.

Volume of production: The site must meet a certain level of production. This is defined by the implementer in collaboration with the exporter.

Child Labor: Site must conform to the DRC law in terms of child Labor, where children under 16 years should not work at the mine site.

Human and sexual trafficking: The implementer must make sure there is no Human and/or sexual trafficking on site.

Governance: The mine site must have appropriate (and non-predatory) governance structures in place, or willing to be deployed.

Figure 9. Gold Pilot Selection Criteria



Figure 10. Crushing gold at Nyamurhale. Photo credit: What Took You So Long for USAID.

Gold Implementation Plan

Informed by the findings of the assessment, CBRMT produced a gold implementation plan. The plan describes the approach to first piloting gold supply chains in Maniema and Ituri provinces; confirms site selection criteria; describes a three-phase approach (enumeration and assessment, implementation and capacity building, and export and sustainability); presents a detailed implementation schedule; and shares an approach to integrating environmental and gender considerations.

IMPLEMENTATION

As described in the gold implementation plan, pilot projects are designed to test the application of different gold traceability and due diligence assurance systems and will engage with LSM companies, cooperatives, government mining officials, and civil society. Over the course of the project, CBRMT selected five gold pilot sites from three provinces, each with a distinct set of conditions and key players: Matete, Mongbwalu, Mambasa, Bikenge, and Nyamurhale. The first two (Matete and Mongbwalu) are in the vicinity of LSM sites; Mambasa scaled up an existing responsible sourcing site (Just Gold); Bikenge and Matete are characterized by tremendous logistical challenges and low levels of capacity; and Nyamurhale is situated in a rural location under the authority of a traditional leader. This section describes progress made in investigating and developing supply chains in each location.

MATETE (2015–2017)

Matete is comprised of six gold mine sites under the management of nascent mining cooperative Coopérative Minière des Creuseurs Affectés (COMICA) and is situated 25 kilometers from Banro's Namoya industrial gold mining concession in Maniema province. A total of 650 artisanal miners were



Ist

artisanal gold supply chain from DRC to export to an LBMA good delivery refinery

343.24

grams of conflict-free gold exported to international buyers

Ist

test and export using the DRC's gold traceability system

Ist

due diligence toolkit for artisanal gold

263

miners legally registered and 25 ZEAs created

repositioned from the LSM gold concession to Matete, where it was believed deposits could be artisanally mined in a safe and secure manner. An important case study in ASM/LSM cooperation, Matete benefited from Banro's logistical and transport assistance, and CBRMT worked closely with Banro's community relations department when designing the pilot.

Preliminary CBRMT studies consisting of a scoping mission, geological study, socioeconomic analyses, cooperative capacity assessment, and a baseline on due diligence and traceability confirmed the viability of Matete as a viable pilot site, contingent on substantial support to bolster the capacity of DRC mining services and the COMICA cooperative. Both the DRC and the cooperative lacked the necessary technical and material capacity to productively conduct mining operations while ensuring due diligence of minerals.

CBRMT thus prepared a strategy to formalize the mine site and begin to address capacity gaps. As critical first steps, the project facilitated the establishment of a legal ZEA and signed an MOU with Banro's Namoya Mining Company and separate MOU with the CEEC in June 2016. The Banro MOU describes the resources and responsibilities that both CBRMT and Namoya Mining Company will bring to the pilot project, including support for purchasing equipment, logistics, and geological activities. The CEEC MOU describes ITOA and CBRMT responsibilities for implementation of the traceability system, including the roles for training and financial support. BSP produced a due diligence and traceability plan outlining how gold will be traced from the mine of origin up to the point of export, the roles and responsibilities of all traceability and due diligence providers, and our approach to the development of local monitoring networks and the provision of equipment. CBRMT also produced foundational documents for the due diligence and traceability plan, including the Know Your Customer questionnaire and the Supply Chain Evaluation questionnaire used to obtain third-party views on risks in the supply chain.

Implementation of project activities at Matete included training five of COMICA's leaders in cooperative administration, governance, and finance; engagement with international gold refiners (LBMA Good Delivery List) and end users to identify downstream partners for the Matete supply chain; hiring of three field-based staff (Pilot Manager, Field Agent, and Financial Manager); completion of OECD and LBMA Compliant Due Diligence Questionnaires; and the development of a due diligence platform. Unfortunately, Matete was beset by delays and challenges. First, the L'Institut Congolais pour la Conservation de la Nature insisted that evaluation missions be undertaken to confirm the proposed site was not within nor did it risk negatively impacting a historical hunting area. CBRMT subsequently supported and participated in two missions in cooperation with L'Institut Congolais pour la Conservation de la Nature, Cadastre Minière (DRC Mining Cadastre), and the Provincial Ministry of Mines. These evaluations spanned several months and ultimately concluded that, in fact, the mine site was not within the boundaries of the Luama-Kivu Protected Area nor would it have any direct impact on this former hunting reserve. In early 2016, CBRMT, with the assistance of many downstream stakeholders, developed a plan to export ASM gold from Matete to an international refiner in South Africa via an established transportation route. The refiner identified for Matete withdrew after concluding that sourcing artisanal gold from the DRC was not worth the perceived risk. Just as CBRMT resumed its preparations for the pilot,

a group of armed bandits attacked the area on February 28 and March 1, 2017; the first attack occurred in Salamabila just outside Banro's concession where CBRMT staff were based, and the second occurred inside Banro's Namoya mining camp. Following the evacuation of our three staff members, CBRMT and USAID agreed to suspend activities at Matete because of security concerns.

MONGBWALU (2015– 2016)

Mongbwalu Gold Mines (MGM) is a large-scale industrial gold concession located in Ituri Province. An assessment mission of MGM was completed in September 2015. This pilot project was centered on the idea that artisanal miners would be hired as laborers using a subcontract between a local small business and MGM to extract ore from at approximately 10 mine sites where MGM was interested in conducting further geological exploration. CBRMT commissioned a study of the viability of this proposed model, including reviewing the relevant due diligence requirements for this model to ensure compliance with international and national guidance and regulations. The results indicated that MGM should identify potential mine sites where subcontractors could work, and specify in more detail the proposed buying formula and its preparedness (or the lack thereof) to work with existing cooperatives.

In response to the report findings, CBRMT held several meetings with MGM's management to persuade them of the need to establish a due diligence and traceability system on-site to ensure OECD Due Diligence Guidance were being met; and confirm that no smuggling was occurring from the sites and that no materials from outside of the approved sites were making their way into the MGM supply chain. In addition, CBRMT held follow-up conversations in April 2016 with international traceability providers who could support the pilot and drafted a request for proposals for traceability at Mongbwalu. CBRMT also reached out to the World Bank PROMINES program, which confirmed they could provide some limited funding for a pilot project at Mongbwalu. Despite these efforts, MGM did not commit to implementing traceability and due diligence as part of their pilot. Moreover, MGM experienced a "rush" of artisanal miners onto the concession, creating serious safety and security concerns for CBRMT's engagement. As a result, it was decided in consultation with USAID that CBRMT would pursue working at Mongbwalu no further.

MAMBASA (2016–2017)

In parallel to its pursuit of a pilot near the MGM site, CBRMT successfully supported a second site in Ituri Province known as Mambasa. Adjacent to the Just Gold Project implemented by IMPACT (formerly known as Partnership Africa Canada), CBRMT supported IMPACT to scale up due diligence and traceability at two mining areas within Mambasa (Tokomeka and Unipe ni Kupe) for a total of 25 mine sites under the Just Gold project. CBRMT's support enabled IMPACT to expand their model to an additional twenty-five mine sites and 288 miners, while increasing the overall volume of responsible gold being bought and sold.

Through its partnership with IMPACT, CBRMT strengthened the due diligence, traceability, and technical capacity of the gold supply chains at Tokomeka and Unipe ni Kupe. This assistance included miner registration; a baseline study on mine site conditions, gender dynamics, and mercury usage; and a technical needs assessment. Technical support entailed the provision of basic processing and personal equipment such as sluices, sluice carpets, water pumps, boots, and shovels.

CBRMT concluded its support of the Just Gold Project once the sites were functional and could continue without USAID funding. The collaborative pilot project was a successful avenue for USAID to test approaches to exporting legal ASM gold that met the OECD Due Diligence Guidance standards. IMPACT will continue to manage the 25 mine sites located at Tokomeka and Unipe ni Kupe mining areas beyond USAID's funding; all sites now have ongoing due diligence and traceability. Achievements included (1) enumeration of 288 miners; (2) 2,138.8 grams of gold tracked and sold through the Just



Figure 11. First Just Gold ring made by Fair Trade Jewelry Company, which refined and alloyed the gold and then manufactured the ring pictured here. Photo credit: Fair Trade Jewelry Co.

Gold Maison d'Achat Modèle (model trading house); and (3) gender sensitization in and around the mine sites involving 1,200 men and women.

The pilot provided many valuable lessons learned about ASM gold traceability and supply chain management. The traceability system was adapted by linking it to the mining pits as opposed to the mining teams. A three-month trial was implemented to identify the characteristics, flow, and volume of gold transactions. In addition, an agent working for the pilot was used to buy the gold directly at the mine site at the end of each day, even before the miners settled their debts. Miners preferred to settle their debts with hard currency instead of gold, because the terms were more favorable (given Just Gold's transparent and fair pricing). This allowed for the Just Gold Project to draw more of the gold into the legal supply chain.

BIKENGE (2017)

Bikenge is a large area where five sites were validated “green” by a joint validation mission in November 2016. CBRMT conducted two assessments at Bikenge. The first assessment confirmed that, of the 15 cooperatives identified, only five were likely to be part of a potential responsible supply chain. The assessment also noted technical services such as SAEMAPE, the Division of Mines, and CEEC were all present on-site and were observed collecting a number of service “fees” and taxes. Relationships between the actors were sometimes tense, and the study noted several property rights conflicts between the cooperatives. Access to the site was also an issue. Bikenge is only accessible by motorbike and, during the rainy season, it can take three hours to reach it from Mingana—the last village accessible by car. There is an airstrip nearby (Kama) that is serviced by small commercial operators hired by

negotiants to transport gold, equipment, and other basic foodstuffs and materials. Most artisanal gold from Bikenge is transported to Bukavu, then onwards to Dubai or Bujumbura. Finally, most of the Bikenge production is prefinanced and sold in Bukavu to powerful negotiants who are deeply embedded in the area. A second assessment in April 2017 investigated production levels and found that officially, SAEMAPE declared 10,790 grams were produced in 2016, but production is much higher, with only 10 percent of the production declared by cooperatives (to avoid taxation). CBRMT concluded it would be very difficult to trace the origins of this prefinancing and compete with actors with top-level connections on-site and in the province. CBRMT thus decided to look for alternative areas other than Bikenge as an option for a gold pilot site.



Figure 12. Artisanal gold from Bikenge, an area explored as a potential pilot gold site. Photo credit: Armel Nganzi for CBRMT.

NYAMURHALE (2017–2018)

In association with the GDRC, CBRMT established a responsible gold pilot project, Bwenge Buchiza (meaning “knowledge is golden” in the local Mashi language). Located approximately 64 kilometers southwest of Bukavu in South Kivu, the pilot is managed by La Cooperative Minière et Agricole de Ngweshe. Approximately 230 Congolese miners are active on the site. Until 2012, the site was occupied by illegal armed groups and the Armed Forces of the Democratic Republic of the Congo (Forces Armées de la République Démocratique du Congo). As a result, for many years no responsible supply chain could be established on-site. CBRMT’s baseline survey of the site determined it met all the criteria for a pilot project, including security, accessibility, legality, a legal and functioning cooperative, no use of mercury on-site, and sufficient production capacity. In March 2017, Nyamurhale was inspected by a joint qualification team and later (May 2017) certified as secure, legal, accessible, and free of armed groups and child labor.

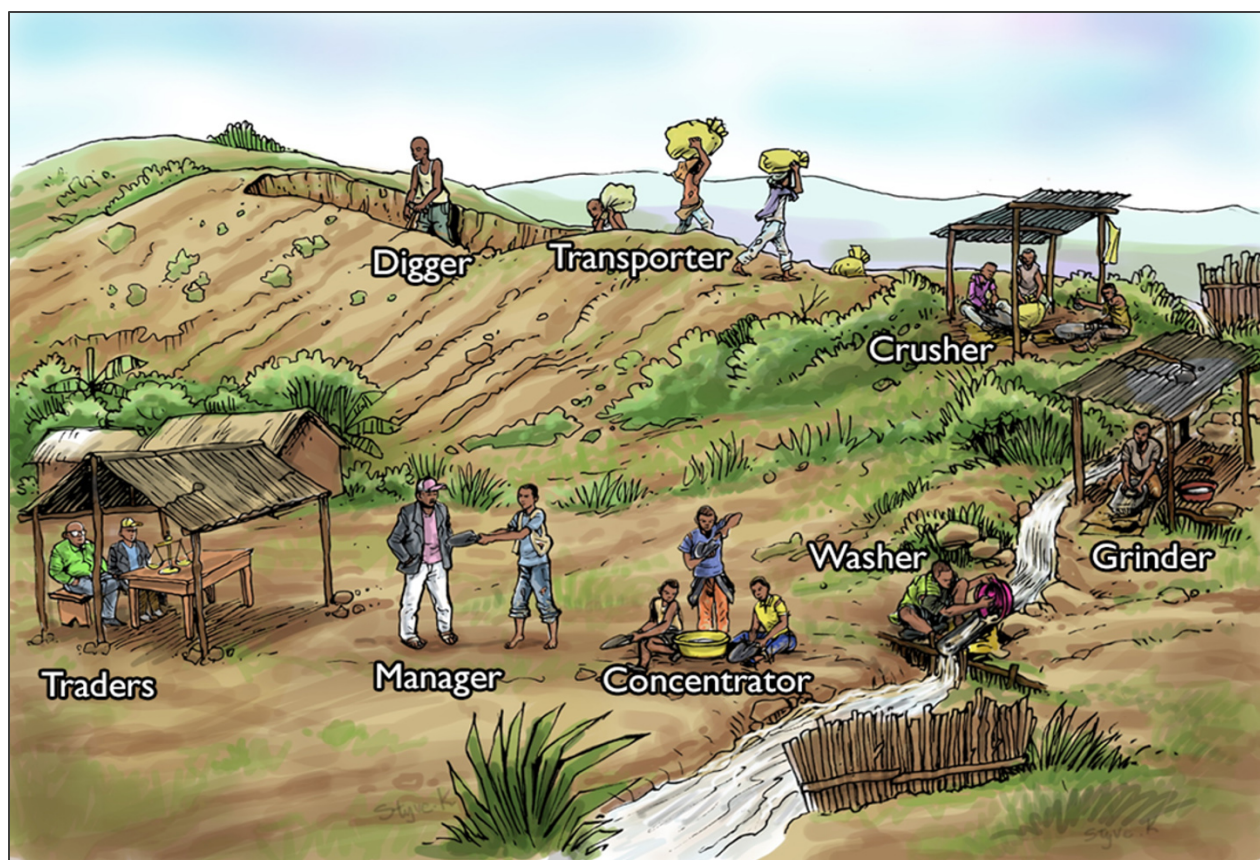


Figure 13. Artist rendering of Nyamurhale downstream actors.

The site is characterized by a highly specialized labor force with no less than eight types of labor (see Figure 13). CBRMT used this data to map the “ecology” of the Nyamurhale site, including the specialized roles of different types of workers and their interactions. Understanding the differentiated roles on-site enabled CBRMT to improve artisanal production methods, implement security and safety measures, and identify critical socioeconomic dynamics. Activities included building the capacity of miners and government officials to implement due diligence and traceability; training to improve the governance of the mining cooperative; and providing equipment to improve production, health, and safety.

Due Diligence

CBRMT ensured that site-level due diligence monitoring of the Nyamurhale gold pilot was implemented. This involved the deployment of four BSP monitors to collect information incidents, production, and socioeconomic conditions of miners. The monitor enters the information into a smartphone, then it is transmitted to an online dashboard (see Figure 14). This dashboard provides real-time data about incidents related to human rights, security, child labor, legality, traceability, and the environment. The incidents are then scored on their intensity and their impact, then put into a matrix that can show if mitigation actions are necessary.

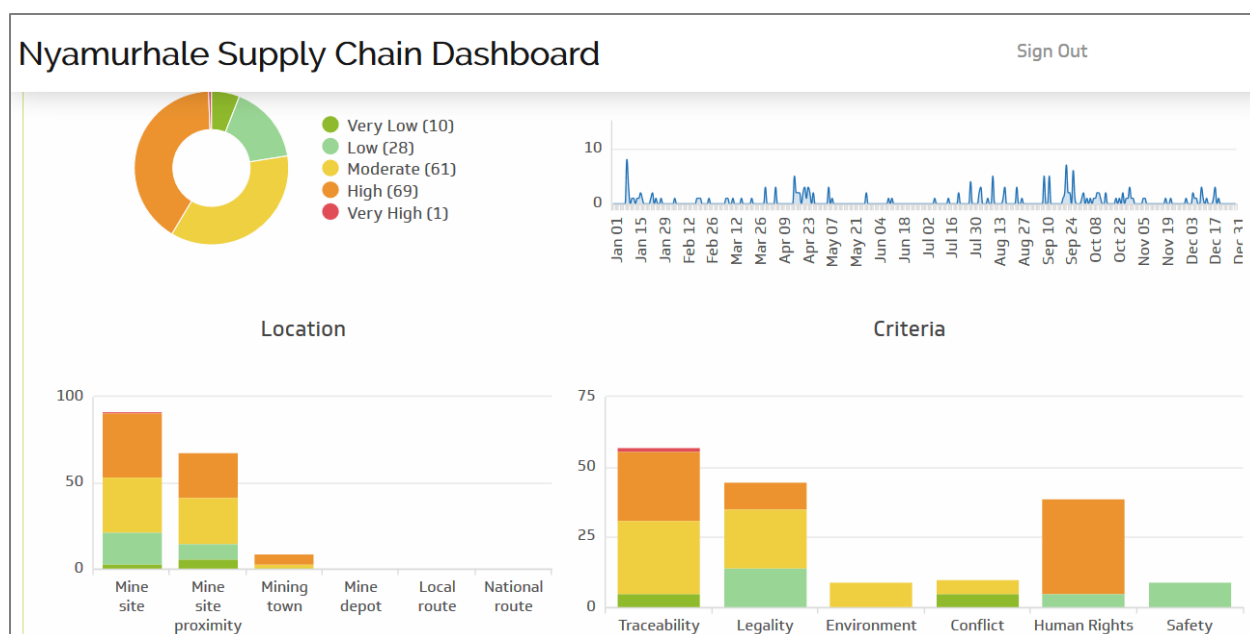


Figure 14. Nyamurhale Supply Chain Dashboard displaying location, type, and timing of incidents observed.

Traceability

Two traceability systems were piloted simultaneously at Nyamurhale: the GeoTraceability system and the DRC's ITOA.

In the GeoTraceability system, data collection begins at the mine site, where locally trained field agents use a smartphone application to track gold from each pit to the point of sale, where it is weighed and placed in secure tamperproof bags with individual radio frequency identification codes on which the date, weight, value, location, and other relevant data are recorded. BSP then connects the radio frequency identification codes with monitoring data, including incidents, income, pricing, socioeconomic indicators, and working conditions, enabling downstream actors to view and easily assess risks and improvements in the supply chain. BSP uploaded information daily to a database within the mobile application, allowing buyers to have relevant traceability (and due diligence) information about the source of their gold prior to export. Using traceability software, gold can be tracked from site to export.

Concurrently, CBRMT worked closely with the national MoM and other technical services to launch the DRC's traceability system for artisanal gold, known as the ITOA. Because ITOA was a nascent system that needed to be tested and adapted, CBRMT piloted it alongside the better known GeoTraceability system to promote learning and build capacity while ensuring a reliable chain of custody. CBRMT provided technical guidance on integrating due diligence data into the ITOA database, preparing a road map for training and testing the system, and inspecting the radio frequency-coded "smart" bags and logbooks. CBRMT also provided technical guidance to ensure the ITOA database would be accessible to downstream refiners and other stakeholders, as well as compatible with due diligence data collected at mine sites.

Equipment Rental Pool

In March 2018, CBRMT delivered to Nyamurhale a shipping container and a significant stock of basic mining and personal safety equipment such as water pumps, hoses, shovels, scales, and protective

clothing (e.g., boots and hard hats) to establish an equipment rental pool to be managed by the mining cooperative. The rental pool provided protective equipment free of charge, as well as low-cost access to basic mining equipment, with the proceeds of the equipment rental used for maintenance and replacement. The rental pool also served as an important incentive for miners to participate in a legal responsible gold supply chain. CBRMT trained three elected managers and members the cooperative on the management of the equipment rental pool, including inventory procedures, record keeping, accounting, rental procedures, and financial management as well as maintenance and security of the equipment to ensure its durability and sustainability. Procedures and controls for the rental pool are outlined in an Equipment Rental Pool Management Plan.

Achievements

A number of notable achievements were realized at Bwenge Buchiza gold pilot:

- ✓ CBRMT worked with the International Organization for Migration, Cadastre Minière (DRC Mining Cadastre), *Comité Provincial de Suivi*, exporters, and the cooperative to qualify as ZEAs 15 mine sites in and around Nyamurhale ZEAs.
- ✓ CBRMT formalized 263 miners through the SAEMAPE identification process and card registration for miners.
- ✓ The first supply chain designed to source conflict-free artisanal gold from the DRC by U.S.-listed companies since enactment of the Dodd-Frank Act, section 1502, demonstrated the ability to comply with reporting requirements while sourcing from the DRC and African Great Lakes region.
- ✓ The first traced artisanal gold sourced from the DRC to be refined by an LBMA good delivery certified refinery demonstrated the effectiveness of due diligence systems and that responsible, international companies can engage in the region.
- ✓ The first conflict-free, artisanal gold conforming to international due diligence standards (OECD, LBMA) to be exported from the DRC to a U.S. jeweler demonstrated that companies can support economic development in the conflict-affected region while avoiding illicit trade.
- ✓ The first mine site and exporter to pilot the DRC's traceability system (ITOA) demonstrated GDRC commitment to responsible artisanal gold.
- ✓ The first testing of an equipment rental pool model designed to increase gold production and recovery rates through a sustainable business model.
- ✓ 13 unsafe mining pits were closed and/or secured, significantly reducing the number of accidents on-site.

MOVING FORWARD: CBRMT demonstrated proof of concept; however, in the future, models need to be scalable, sustainable, and premised on a clear business case. Recommendations include the following:

- **Scale up responsible gold mining.** Use findings from the International Peace Information Service-led Evaluation of Potential Responsible Artisanal Mine Site Hubs: South Kivu to continue to scale up responsible gold sourcing.
- **Conduct a thorough business analysis of potential gold supply chains before implementation.** This will provide a better understanding, for example, of potential pricing formulas, taxation rates, and costs related to security and transport.

- **Digitize the GDRC's gold traceability system, ITOA.** Support the CEEC in its transition of ITOA from a paper-based system to a digitized database.
- **Encourage exporters to engage in responsible supply chains.** More exporters need to be vetted and their capacity improved to enable them to engage in responsible supply chains.
- **Explore ways to address the issue of prefinancing of responsible supply chains.** Consider Grants Under Contracts to enable more freedom in supporting emerging businesses.
- **Identify and implement sustainable and cost-effective means of conducting risk-based due diligence monitoring at mine sites.** Potential ideas include training a cadre of qualified local monitors to conduct on-site due diligence; using new technologies to improve transparency and information dissemination; and ensuring due diligence systems are appropriately aligned with site-based risks.
- **Conduct a thorough assessment of stakeholders, systems, and local dynamics to identify and mitigate risks.** Determine who the actors are and how they interact, what the trade dynamics are, how and who makes decisions, what tensions exist already, and what people or outside resources can be used to support interventions. Conduct a risk assessment and have a mitigation plan in place.
- **Be thoughtful about change management.** Introduce change incrementally. Try not to introduce too much change into the system before you understand how it works and what impact you might have. In many cases, it is better to use the existing system and make small adaptations rather than large, sweeping changes.
- **Adopt a flexible program design.** CBRMT demonstrated the importance of being flexible in your programming design, given the uncertain operating environments. Pilot sites can be rendered insecure just days after a significant investment. When designing programs, make investments in more than one mine site.

KEY PRODUCTS

Implementation Plan for Responsible Sourcing of Artisanal Gold from the DRC (April 2015).

Working with Producers to Responsibly Source Artisanal Gold from the DRC (May 2015).

Updated Implementation Plan for Responsible Sourcing of Artisanal Gold from the DRC (April 2016).

Rapport d'Etude de Base sur la Chaîne d'Approvisionnement de l'Artisanat Minier à Bikenge du Puits à la Vente (February 2017). [Available upon request from Tetra Tech ARD.]

Increasing Gold Recovery Rates While Reducing Environmental Harm (February 2018).

Implementation Roadmap for the Piloting of the ITOA Traceability System (October 2018). [Available from Tetra Tech upon request.]

Self-Monitoring Due Diligence Toolkit for Upstream Actors (October 2018).

Evaluation of Potential Responsible Gold Mine Site Hubs (December 2018).

ASM Gold Downstream Due Diligence Sourcing Template (developed with the RAGS Forum). [See www.ragsforum.org.]

Our Impact

“Tetra Tech has allowed, for once, to demonstrate that it is possible to trace gold and thus to formalize the artisanal sector of gold in DRC.”



Guillain Robert Fariala Kizozo
CEEC Representative



4. COMMUNICATION AND OUTREACH

STRENGTHENING COLLABORATION FOR A RESPONSIBLE MINERALS TRADE

CBRMT initiated communication and outreach strategies in collaboration with partners—both in the DRC and internationally—to promote a responsible minerals trade in the region. From producing virtual reality (VR) films and coordinating technical partners, to deploying online action kits and presenting at international conferences, CBRMT employed multiple methods to convey the objectives, achievements, and challenges of USAID’s RMT portfolio.

CBRMT’s original focus on communication and outreach centered on coordination across key stakeholders operating in the minerals sector within the DRC and internationally; presenting results and lessons learned at international fora such as the OECD; and conveying the objectives, achievements, and challenges of the RMT portfolio to a general audience. With time, however, CBRMT’s communication ambitions grew to include educating consumers and companies about how to responsibly source artisanal gold from the DRC. CBRMT’s communication efforts also evolved to focusing on reframing the narrative around conflict minerals, moving away from the prevalent images of minerals tainted by armed groups and child labor, to artisanal mining as a key livelihood activity and the growing success of responsible supply chains.

Using innovative mediums such as VR and online social action kits as well as collaborating with both private sector and nonprofit partners, CBRMT was able to vastly increase the profile and impact of USAID’s RMT portfolio. Ultimately, the success of the project’s communication efforts became an elemental source of support for the rest of the project’s technical components.

JOURNEY OF GOLD: A VIRTUAL REALITY FILM

Most people will never have a chance to visit an artisanal gold mine in the DRC, nor will they be able to see firsthand the efforts underway to establish conflict-free gold supply chains from Eastern DRC. CBRMT partnered with Google and the RAGS Forum to produce an eight-minute VR film titled *Journey of Gold*, which takes viewers deep inside the mine, shows firsthand how artisanal gold is produced, and introduces the miners and cooperative leaders who work there. To promote the film, celebrity influencers such as Robin Wright and Mia Farrow tweeted about the film, and Google produced branded VR cardboard viewers and T-shirts. With more than 29,000 unique views on YouTube to date, five film festival laurels, and distribution by the Discovery VR network, the film proved to be a highly successful communication tool and exemplified an exceptional public-private partnership. The success of *Journey of*

Gold also demonstrates how VR can be a powerful tool in communicating key messages and raising awareness on mining and important development issues in the DRC and elsewhere.

ONLINE SOCIAL ACTION TOOLKIT

In association with the *Journey of Gold* VR film, CBRMT produced an online social action kit (journeyofgold.org) designed to educate consumers and companies about responsible gold sourcing from the DRC. The website had more than 9,000 views and leveraged additional exposure for our partners, including BSP, Fair Congo, RESOLVE, and the Enough project. CBRMT aimed not only to communicate about our own efforts, but also to use the online toolkit to direct consumers and companies to other pilot projects working in the DRC to responsibly source and export artisanal gold.



Figure 15. *Journey of Gold* official poster.

RESPONSIBLE MINERALS TRADE FILM

To highlight the value and impact of USAID's investment in establishing an RMT, CBRMT also produced a 15-minute film portraying the significant work that has been achieved to date, including in particular mine site validations, capacity building, health and safety improvements, and the first export of certified responsible gold from the DRC to a major U.S. jeweler (Signet). The film was first posted on USAID/DRC's Facebook page and had more than 1,200 views the first two weeks. On the international stage, the film was screened by more than 500 attendees of the 2018 LBMA Annual Conference closing plenary in Boston and the RMI annual meeting in Santa Clara, CA. Screenings were followed by question-and-answer sessions with downstream partners during which participants learned more about *why* and *how* major U.S. companies are responsibly sourcing from the DRC. CBRMT anticipates the film



will continue to be a valuable tool for USAID to build support for the RMT portfolio in the United States and abroad.

WOMEN IN MINING FILM

In collaboration with a Congolese radio and film company (Pan African Label), CBRMT produced a five-minute film describing the project's approach to increasing awareness around women's roles and rights in the artisanal mining sector. The film draws on interviews with men and women miners and community members to convey the challenges women face in the sector and documents CBRMT's approach to gender integration in the ASM sector.

COORDINATION

Responsible Artisanal Gold Solutions Forum. The RAGS Forum is a multi-stakeholder coalition designed to learn about and address critical barriers to the production and trade of artisanal gold from the Great Lakes region. CBRMT participated in regular forum calls to provide updates on our gold pilot projects and engage with downstream actors to resolve challenges and develop new tools to enable responsible sourcing. Key outputs included the first open source due diligence toolkit adapted for artisanal mining; the collaborative production of the VR film; an online social action kit; the publication of lessons learned from pilot projects; and opportunities to jointly discuss and address challenges in order to support conflict-free gold from the DRC. The RAGS Forum also convened regular conference calls between downstream partners to resolve questions around inventory-financing, transport and security as well as compliance with LBMA requirements, including the extent to which the information presented/reported is sufficient to satisfy due diligence from the mine to the exporter.

Responsible Minerals Initiative. As one of the largest member-based organizations dedicated to responsible sourcing in the region, RMI plays a key role in auditing, clarification of standards, communication, and collaboration. CBRMT and our partners worked with RMI to ensure our primary subcontractor—BSP—was recognized by RMI. This milestone confirmed that BSP (and the participating smelter) had the necessary systems in place to responsibly source minerals in conformance with current global standards. In addition, CBRMT organized a visit by two-person delegations from RMI to tin and gold mine sites in North and South Kivu, where RMI staff met with mining cooperative representatives, titleholders, mining police, government officials, and civil society representatives.

Organisation for Economic Co-operation and Development. CBRMT engaged extensively with the OECD over the course of the project to promote, adapt, and harvest lessons for responsible business conduct as defined by the *OECD Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas*. Key activities included participating and presenting on panels at forum meetings between 2014 and 2018; contributing to a frequently asked questions brochure about how to responsibly source artisanal gold; and regularly engaging with OECD staff to keep them apprised of successes and challenges related to CBRMT pilot projects. Regular engagement with OECD technical staff also provided valuable input and guidance in the implementation of the Nyamurhale gold pilot.

29,673
views of first VR
film about ASM
gold in the DRC

36
events held
reaching 813
participants

First
film about USAID
RMT portfolio in
DRC

Active Member of
the RAGS Forum

9,000
views of online
social action
toolkit



Figure 16. 12th OECD Forum on Responsible Mineral Supply Chains, where Jen Peyser of Resolve and Catherine Picard of CBRMT shared lessons learned from the Bwenge Buchiza Gold pilot project. Photo credit: Patricia Syvrud, University of Delaware.

Technical and Financial Partners (Partenaires Techniques et Financiers). CBRMT served as the secretariat for regular meetings of PTF operating in the DRC's mining sector. Participants in the PTF included representatives from USAID (Chair), the European Union, Department for International Development (DFID), BGR, Pact, International Organization of Migration, World Bank's Growth with Governance in the Mining Sector Program, and the Canadian and U.S. embassies. PTF participants shared information regarding programming for the artisanal mining sector, prepared contributions to the DRC's Groupe Thematique Mines-Hydrocarbon-Energy organized by the MoM, and discussed numerous topics related to the artisanal mining sector including taxation, export processes, smuggling, fraud, and traceability.

Comité Provincial de Suivi: At the Provincial level, CBRMT was a key participant in Comité Provincial de Suivi meetings, which serve as local multi-stakeholder fora to discuss and resolve conflicts and tension related to responsible mineral sourcing at the local level (including allegations of fraud, smuggling, and other abuses at mine sites). Key outcomes included identification of priority mine sites to be validated; and resolution of conflicts between mining cooperatives and titleholder.

"The PTF forum allows us to share information about our work, to reflect together, and to see what is feasible, but also, to avoid duplication."

- PTF member

Coordination with LSM Companies. Over the course of the project, CBRMT provided technical support and capacity building targeting artisanal miners operating next to three major industrial mining operations (Banro, Alphamin, and MGM). Technical support included evaluating models for co-habitation with artisanal miners; providing capacity building to artisanal mining communities to implement alternative livelihood projects; and proposing models for traceability and due diligence systems at artisanal mining areas operating adjacent to industrial concessions.

MOVING FORWARD: Communication and collaboration were at the heart of CBRMT’s efforts from the start of the project and were critical to building strong relationships with other implementing partners, the GDRC, mining communities, and the private sector. In the last year, a major emphasis was placed on deploying communication products to capture milestones and educate consumers and companies about how to responsibly source minerals. We recommend continuing to communicate about opportunities, lessons learned, and challenges associated with responsible sourcing of minerals in the DRC by considering the following points:

- **Leverage communication.** Produce and disseminate innovative communication products (e.g., VR film, social media toolkits, and short films on supply chain) to attract investment and support for responsible mining in the DRC.
- **Share lessons learned.** Identify and publish lessons learned about the first export of artisanal gold from the DRC to an LBMA refiner; and capturing how downstream operators addressed concerns raised by auditing, banking, insurance, legal, and risk management teams.
- **Devote the necessary resources and time** to engaging with stakeholders at the national, provincial, and local levels. This could be through existing or new fora, such as:
 - Attract additional members and funding in support of the **RAGS Forum**.
 - Renew the **informal gold working group within the DRC**, which brings together implementing partners working on the ground to discuss lessons learned, challenges, and opportunities.
 - **Expand regular outreach to GDRC officials**, particularly senior officials in the Mining Ministry, to communicate about milestones and challenges related to responsible sourcing.
 - Continue to engage with the **RMI** to present perspectives from the field, including by supporting in-country field visits and participating in regular conference calls.
 - Continue to convene the **PTF** to ensure harmonization and information sharing across donors working in the mining sector. Consider having a specific topic of discussion for each meeting, ascribe the PTF with more decision-making authority, track resolution of issues, and expand to include regional topics.

KEY PRODUCTS

Journey of Gold Virtual Reality Film.

Journey of Gold Social Action Kit.

Responsible Minerals Trade Film.

Lessons Learned White Papers Years 1 and 2 (Jointly developed with Resolve and presented at OECD).

Press release detailing the first export of gold from Nyamurhale and other milestones for the artisanal gold sector.

PTF Meeting Minutes (Available Upon Request).

Our Impact

“CBRMT has superb stakeholder collaboration, as demonstrated by its work with the ICGLR, DRC government officials, mining communities, and civil society, putting in-place and operationalizing first two ASM gold traceability systems, and building partnerships with international exporters, jewelry manufacturers, and retailers to promote the export and sale of conflict-free ASM gold from the DRC.”



Leah Butler

Vice President, Responsible Business Alliance

ANNEX A: DELIVERABLES & PRODUCTS

Deliverable	DEC Link /Website
ASSESSMENTS AND STUDIES	
1. Organizational Capacity Assessment [of the Center for Evaluation, Expertise and Certification and the Provincial Division of Mines] (October 2014)	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5MzUy
2. Capacity Building for a Responsible Minerals Trade (CBRMT): Needs Assessment of the ICGLR Independent Minerals Chain Auditor (March 2015)	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5MjQx
3. CBRMT Gender Analysis (April 2015)	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=MjAzNzA3
4. CBRMT: A Rights-Based Approach to Legal and Policy Reform in the DRC Mining Sector: Findings from Scoping Trips & Roundtable Discussions (April 2015)	https://dec.usaid.gov/dec/content/Detail_Presto.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5Mjgy
5. CBRMT: Working with Producers to Responsibly Source Artisanal Gold from the Democratic Republic of the Congo (May 2015)	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=MjA4MzA5
6. CBRMT: Implementation Plan for the ICGLR Independent Minerals Chain Auditor (May 2015)	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5NTQl
7. CBRMT Functional Organizational Plan & Support Traceability, Due Diligence and Certification Initiatives in the DRC (July 2015)	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5NTQ2
8. CBRMT: Analyse Juridique Des Politiques Et Des Reglements Miniers de la RDC (July 2015)	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5NTgz
9. CBRMT: The Regional Certification Mechanism of the International Conference of the Great Lakes: Evaluation and Recommendations (July 2016)	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=Mjl3Mzk0
10. Evaluation of Potential Responsible Gold Mine Site Hubs (November 2015)	https://pdf.usaid.gov/pdf_docs/PA00TFBS.pdf
WORKPLANS AND TECHNICAL STRATEGY DOCUMENTS	
11. CBRMT Environmental Mitigation and Monitoring Plan (March 2014)	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5NTQ5
12. CBRMT Work Plan Year I: July 2014-Sept 2015	https://dec.usaid.gov/dec/content/Detail_Presto.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5NTUy
13. Implementation Plan for Responsible Sourcing of Artisanal Gold from the DRC (April 2015)	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTE0OTIz

Deliverable	DEC Link /Website
14. Updated Implementation Plan for Responsible Sourcing of Artisanal Gold from the DRC (April 2016)	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctlID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTE0OTI4
15. CBRMT Revised Work Plan: July–December 2015	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctlID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5NTUx
16. CBRMT Capacity Building and Training Plan: March 2016–June 2017	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctlID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5NTQy
17. CBRMT Scaling-Up Due Diligence and Traceability Systems for Tin, Tantalum and Tungsten (April 2016)	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctlID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5Mjc3
18. CBRMT Revised Work Plan: January 2016–June 2017	https://dec.usaid.gov/dec/content/Detail_Presto.aspx?vID=47&ctlID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5Mjc5
19. CBRMT Work Plan: July 2017–June 2018	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctlID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5NTQz
20. CBRMT Environmental Monitoring & Mitigation Plan Update (October 2017)	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctlID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5MzMl
21. CBRMT Work Plan May–December 2018	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctlID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5MzM4
QUARTERLY REPORTS	
22. CBRMT Quarterly Progress Report, July–September 2014	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctlID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5NTUz
23. CBRMT Quarterly Progress Report, January–March 2015	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctlID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5MjQz
24. CBRMT Quarterly Progress Report: April–June 2015	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctlID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTE0OTMw
25. CBRMT Quarterly Progress Report: July–September 2015	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctlID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTE0OTg3
26. CBRMT Quarterly Progress Report: October–December 2015	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctlID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5NTUw
27. CBRMT Quarterly Report: April–June 2016	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctlID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA5NTQx

Deliverable	DEC Link /Website
28. CBRMT Quarterly Report: January–March 2017	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTE0OTgw
29. Quarterly Report: July–Sept 2017 & Annual Report	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTE0OTc5
30. CBRMT Quarterly Report: Oct–Dec 2017	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTE1MjM2
31. CBRMT Quarterly Report: Jan–Mar 2018	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTE1MjM3
32. CBRMT Quarterly Report: July–September 2018 & FY 2018 Annual Report	https://dec.usaid.gov/dec/content/Detail_Presto.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTEzOTI3
TECHNICAL PRODUCTS	
33. CBRMT: Recueil Des Modules De Formation ASM (June 2016)	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTEzMDU5
34. CBRMT: Technical & Financial Partners (PTF) Meeting Summary of September 21, 2017	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA4ODg2
35. CBRMT: Reforme Du Code Minier En Rdc: Recommandations Relatives Au Secteur Minier Artisanal (September 2017)	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA4ODgz
36. Increasing Gold Recovery Rates While Reducing Environmental Harm (February 2018)	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTE1MTM3
37. CBRMT: DRC Mining Code Reform: Recommendations for the Artisanal Mining Sector (November 2017)	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA4ODgy
38. Supply Chain Systems Evaluation: The Democratic Republic of Congo (DRC) Critical Assessment of the Tracking Mechanisms deployed on Congolese Supply Chains: The Case of Société Aurifère du Kivu et du Maniema (March 2017)	http://www.icglr-rinr.org/media/attachments/2018/10/15/imca-office-investigation-report-2017-executive-summary.pdf <i>Full report not public</i>
39. CBRMT Technical & Financial Partners (PTF) Meeting Summary of February 14, 2018	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA4ODg1
40. CBRMT: Technical & Financial Partners (PTF) Meeting Summary March 20, 2018	https://dec.usaid.gov/dec/content/Detail.aspx?vID=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTA4ODgw
41. 15 Legal Decrees Establishing Artisanal Mining Zones (ZEAs). Issued in 2018	Available upon request from the DRC MoM

Deliverable	DEC Link /Website
42. Self-Monitoring Due Diligence Toolkit for Upstream Actors (October 2018)	https://pdf.usaid.gov/pdf_docs/PA00TDJl.pdf
43. CBRMT: DRC National ASM Gold Strategy Workshop Proceedings (October 2018)	https://dec.usaid.gov/dec/content/Detail_Presto.aspx?vlD=47&ctID=ODVhZjk4NWQtM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=NTEzOTI2
COMMUNICATIONS PRODUCTS	
44. Stopping the Flow: How an artisanal mine in the DRC is embracing sustainable technologies to keep mercury out of the environment. A Q & A with geosciences expert Paul Cordy (a blog)	https://tetrachintdev.exposure.co/stopping-the-flow
45. Participatory Theatre Film	Available upon request from Tetra Tech
46. Lessons Learned White Papers Years 1 and 2 (Jointly developed with Resolve and presented at OECD)	http://solutions-network.org/site-ragsforum/resources/
47. Press release detailing the first export of gold from Nyamurhale and other milestones for the artisanal gold sector	http://www.idexonline.com/FullArticle?Id=44306
48. Journey of Gold Social Action Toolkit	www.journeyofgold.org
49. Journey of Gold Virtual Reality Film	https://www.youtube.com/watch?v=_bXgW6ZD6wM
50. USAID Responsible Minerals Trade Film	https://www.land-links.org/2018/11/the-dream-of-a-responsible-minerals-trade-in-the-drc-becomes-a-reality/

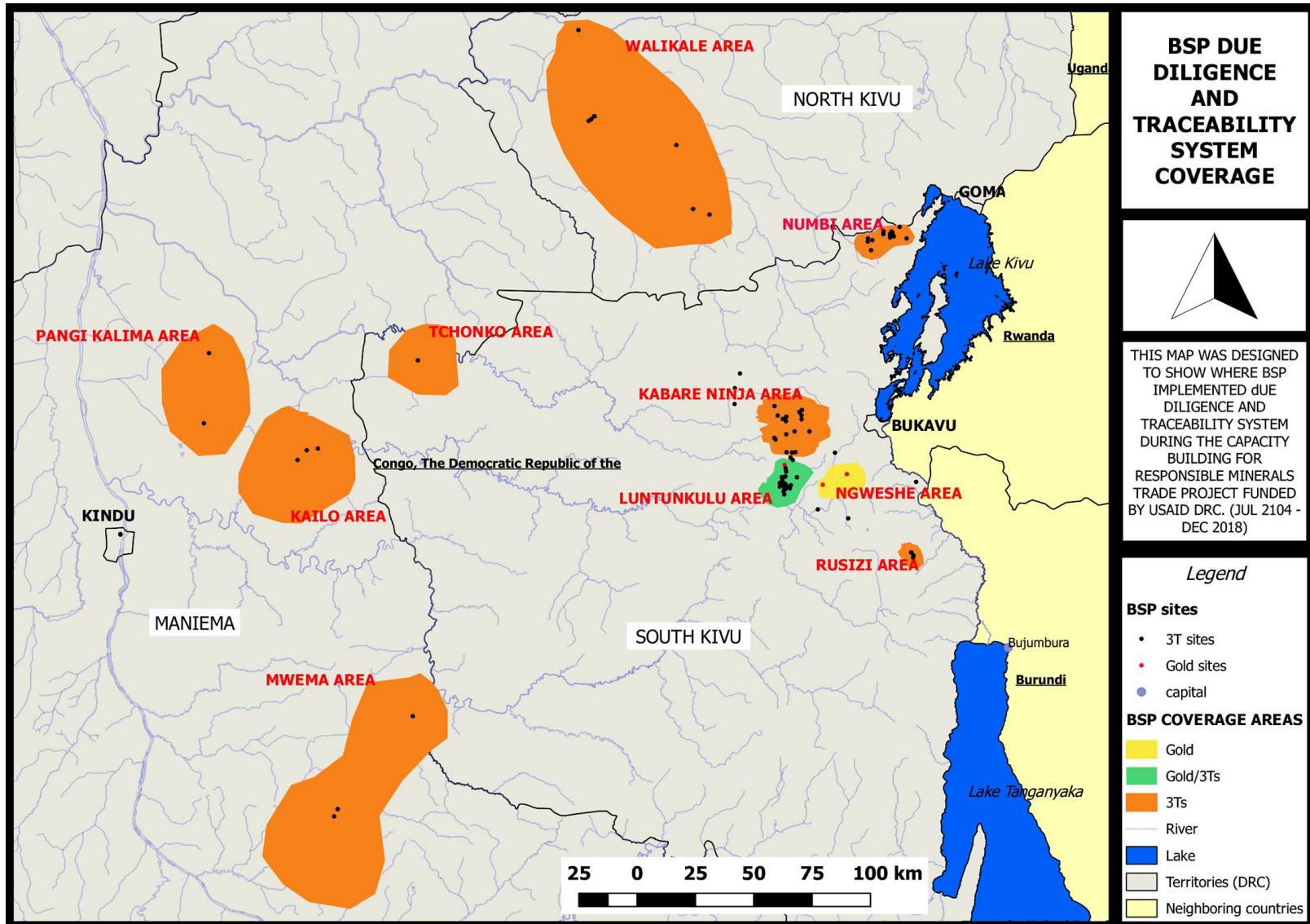
ANNEX B: PERFORMANCE INDICATORS

Fiscal Year	Y1	Y2	Y3	Y4	Y5	LOP
Performance Indicator	2014 (July-Sept)	2015 (Oct-Sept)	2016	2017	2018	
Legal and regulatory reforms proposed or implemented: The number of specific pieces of legislation or implementing regulations affecting resource rights of the urban and rural poor adopted by the country attributable to USAID support (1.1.)	0	2	1	1	18	22
Number of IMCA investigations completed and report provided (1.2.)	0	0	0	0	1	1
Stakeholders trained: The number of public officials, traditional authorities, project beneficiaries, and representatives of the private sector receiving formal on-the-job land training or technical assistance regarding registration, surveying, conflict resolution, land allocation, land use planning, land legislation, land management, or new technologies (2.1)	0	248	1,049	652	750	2,699
Number of people attending USG-assisted facilitated events geared toward strengthening understanding and awareness of resource rights and resource governance-related issues (2.2)	0	247	314	11	241	813
Number of activities (meeting and workshop) in support of donor coordination and information sharing (2.4)	0	9	7	0	0	16
Number of gold supply chains implementing due diligence and/or traceability (3.1.)				1	1	2
Number of miners participating in CBRMT gold scaling up and piloting process (3.2)		34	156	73	263	551
Number of 3T supply chains implementing due diligence and/or traceability (3.3)			3	3	3	9
Number of miners participating in CBRMT 3Ts scaling up and piloting process (3.4)					5,062	5,062

Fiscal Year	Y1	Y2	Y3	Y4	Y5	LOP
Performance Indicator	2014 (July- Sept)	2015 (Oct- Sept)	2016	2017	2018	
Number of activities (meetings and workshops) geared toward strengthening coordination and communication on resource rights and resource governance-related issues organized with the support of CBRMT project ² (4.1)				21	15	36
Number of independent third-party audits initiated by ICGLR		1	7			8

² Language of indicator was previously “Number of meetings/workshops convened or supported by CBRMT to facilitate information sharing, coordination, sharing best practices in support of establishing a responsible minerals trade.”

ANNEX C: DUE DILIGENCE & TRACEABILITY MAP





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