

BISIE SECURITY REPORT

FOR THE PERIOD 2010-September 2015
(Reference report 3 for stock management process)

Prepared by Pact Institute



View of mine "45" from the mountain, June 2010

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BISIE SECURITY REPORT: FOR THE PERIOD 2010-September 2015

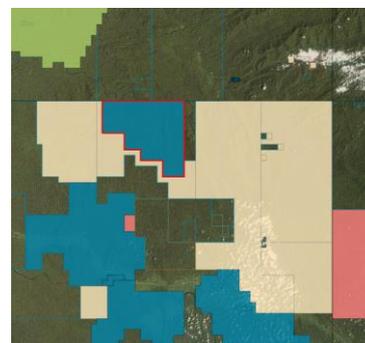
1. BACKGROUND AND INTRODUCTION

The Bisie mine in North Kivu is infamous in older conflict mineral advocacy campaigns (pre-2009). Numerous reports mention either interference of FARDC rogue brigades (including 85th to 212th Brigade of FARDC) in the mine of Bisie until 2010, and then presence and/or control of the mines by armed groups like Maï Maï Sheka and Simba until February 2012. However, since 2013, while tensions and security incidents are still observed, the general security situation in relation to armed groups in and around Bisie has improved.

Apart from interference of armed groups in the mine of Bisie, tensions have also been present between companies who have been engaged in activities at the site over the period described, and artisanal miners who claim to have originally discovered and worked at Bisie. Some reports of security and human rights incidents arise from these tensions between economic actors rather than armed groups, which can also fuel allegations and rumour regarding links between various parties and various armed groups.

The first research permit (PR 5266) on Bisie was issued in 2006 to Mining Processing Congo (MPC) which enabled that company to perform exploration on the site. However many challenges existed, including strained relations between MPC and the cooperatives which hampered progress of that exploration. This was addressed in 2010 by the Government of the DRC through facilitation of an agreement between the cooperatives and MPC, following which the situation became calmer, and in recent years allowed progress towards the development of the industrial mine.

In February 2015 the licence on part of the 5266 area was transferred into an exploitation permit (PE 13155) for tin and gold valid until 2045, and in March 2015, the rights and obligations of MPC were transferred to Alphamin Bisie Mining SA (ABM). The valid exploitation permit concession area 13155 of ABM is shown in the map, outlined in red (from mining register January 2016). ABM is currently 80% owned by Alphamin Resources Corporation (Canada), 5% by the Government of the DRC, and 15% by the Government of South Africa through its wholly-owned Industrial Development Corporation.



However, over the same period, artisanal miners in the territory have been impacted by the Government mining suspension between 09 September 2010 and 10 March 2011 and the de-facto embargo driven by the Dodd Frank Act from 2011 onwards which added further complexity to the situation. Bisie has never been validated by the Government and artisanal activity is not part of the formal system restricting opportunity for cooperatives to sell their minerals and leading to the creation of mineral stocks. These are owned locally, and the continued presence of stocks has created a reason for the continued presence of miners and negociants in Bisie, thus hampering the industrial development. Allowing stock to leave, so that the miners receive payment and can also leave, is seen by most local stakeholders as a necessary step towards progress and something that supports measures already taken by authorities to reduce artisanal mining on the site. In 2015, MPC/ABM issued a letter of non-objection to removal of stocks from Bisie.

The objective of this report is to assess the security situation focusing from 2012 to September 2015, during the time of production of the Bisie stock. The report will provide first general information about Bisie, and armed groups as well as public security forces; the report will then review chronologically the situation at and around Bisie from 2011 to September 2015; before assessing other sources of information.

2. METHODOLOGY

This research was undertaken to gain an in-depth understanding of the security situation prevailing in Bisie mine, on the transport route and in Walikale territory from 2010 to the end of September 2015.

The research was carried out using different methods:

- A desk review of all reports and security related documents publicly available about Bisie was undertaken. This research includes notably reports from the UN Group of Experts, Security Council resolutions, Reports from the UN Secretary General, Reports from Global Witness, Enough, Human Rights Watch, IPIS and US Department of State. Documents were analysed and compared with other source of information, which allowed Pact staff to assess the credibility of the source of information;
- Documents were also gathered on the local level, including letters from the civil society, members of the local, provincial and national authority as well as declaration from the DRC public security forces;
- Field missions were carried out by Pact team at different times: first in 2010 and then several times in 2014 and 2015:
 - A first mission was done in June 2010 at the mine of Bisie, and along the route from Bisie to the trading centre Ndjingala;
 - In April 2014, an official joint qualification mission encompassing MONUSCO, Divimines, Mining Register, iTSCi, COMIMPA cooperative, SAKIMA, MPC/Alphamin, civil society, and ADECADEWA¹ took place in Walikale territory. The joint team assessed the situation in Bisie;
 - A mission was carried out in June 2015, together with Provincial authorities to check on the stock of minerals present at Bisie;
 - A mission was carried out in November 2015 by a senior Pact staff in the region, to specifically gather more information on the security level in and around Bisie. Pact staff went to Walikale town, and Njingala and interviewed a wide range of actors including the territory administrator of Walikale, MONUSCO, FARDC, Mine police (PMH), intelligence services (ANR), Members of the civil society, Members of the cooperatives currently at Bisie and SAESSCAM. Also, information was collected from processors/exporters located in Goma, as well as the different stakeholders groups (CLS and CPP) present in Bisie, Walikale and Goma;
 - A Pact staff member was also present in Bisie from October to the end of December 2015. While his role was to overview the tagging process, the staff also followed up on information gathered during previous missions.
 - ABM/MPC were engaged via local staff and stakeholder meetings in discussion of the stock clearance process, and were requested to provide information, some of which was provided following the first draft of this report in early April 2016.

Relying on these different sources of information, Pact was then able to carefully assess risk for the stock present at the mine, at the trading centre in Njingala and in Goma, using the iTSCi incident report matrix. Hence, for instance, 'Non state or unidentified armed groups including criminal bandits illegally control, influence, participate in or tax mineral trade' would be considered as high risk ; while 'Official mission of public or private security forces disrupting activities at or close to a mine, transport route, or trading site of minerals' would be considered as lower risk.

3. GENERAL INFORMATION: BISIE and ARMED GROUPS

3.1 Historical overview of Bisie

The mining site of Bisie was allegedly discovered by indigenous people from Logu village (Bangandula clan) in 2002. The artisanal exploitation of minerals started in 2003, and was controlled by Mr AKUNDULA MAYANI from the Bangandula clan. In 2006, the mining site of Bisie became more famous and attractive for mining due to the increase of the price of cassiterite to 5 US\$ per kilo. As a result, people coming from North Kivu and the

¹ ADECADEWA: Association pour Défendre les droits des entités coutumières et des autochtones pour le Développement Endogène de Walikale – Association for the Defence of traditional authorities and autochtones people for the endogenous development of Walikale.

neighbouring provinces arrived at Bisie. In 2006, more than 25,000 people were allegedly present around the mine, including miners, other workers and services for the village.

Until 2006, the COMIMPA cooperative was the main organisation operating in Bisie. A second, COMIDER was thought to have been created in 2003 and obtained a licence in 2009^{2,3}; while in ~2006, another cooperative was set up: COCABI Cooperative. At that time, in 2006, FARDC commander of the 85th Regiment, Colonel Samy allegedly was controlling the mine. Due to the presence of the FARDC, no non-state armed group arrived at the mine; however FARDC was allegedly involved in mining activities, by for instance extorting the local population, including miners.

MPC operated a purchase office (*comptoir d'achat*) between 2002 and 2009 in Goma. Prior to November 2006, along with other *comptoirs*, MPC was purchasing minerals from Bisie, but in November 2006, MPC stopped buying minerals from that site in order to begin efforts to establish a presence at Bisie to implement its permitted research activities⁴. MPC reportedly then directed purchasing to other areas such as Maniema while other *comptoirs* continued to purchase from Bisie. Tensions and security challenges led MPC to request force majeure to be imposed on its PR title in 2007 which was in place between 2009-2012.

Between 2009 and 2013, the main armed group present or active around Bisie was the NDC Sheka, who were allied with FDLR – until the NDC Sheka turned against them in 2012 – and were responsible for recurrent attacks in the majority of the *groupements*⁵ in Walikale, including Bisie site. The Sheka were mostly controlling the Bisie site from August 2009 until February 2012, collecting taxes in and around the mine and threatening reprisals in case of non-compliance (more details below).

The second important armed group to be mentioned is the Mai-Mai Simba. They were mostly located in the Wasa *groupement*, Wanianga sector; in Lubutu territory, Maniema province; and in the Maiko National Park. They did not play a prominent role at or around Bisie until mid-2013, when they attacked the site (more details below).

These two rebel groups were and still are opposed to each other due to their different ethnic origins. The NDC Sheka belong to the Nyanga ethnic group; whereas the Mai-Mai Simba belong to the Nkumu ethnic group. This led to several clashes between both ethnic groups, especially in the second half of 2013 (more details below). It should be noted that the conflict between those ethnic groups goes back prior to the creation of NDC Sheka. COMIMPA cooperative, whose members – including Sheka himself⁶ – are from the Nyanga ethnic group; while the members of COMIDER cooperative, which is also operating in Bisie, are from the Nkumu ethnic group. The Nkumu ethnic group was regularly marginalized by the Nyanga, the latter repeatedly committing over the years several abuses against the former.

As a result of these historic conflictual relations between the two ethnic groups Nyanga and Nkumu, Walikale territory and especially in Wasa sector saw clashes in mid-2013 between NDC Sheka, Mai-Mai Simba and FARDC, including at Bisie site (see events from 30-31 August 2013 described below).

The map below shows the different administrative sectors and *groupements* in Walikale territory.

Estimated distance from Bisie to the *groupements* in Walikale territory:

The distance is calculated as the crow flies, from Bisie site (located in Wasa *groupement*) to the border of each *groupement*. See the map on next page.

² <http://cosoc-gl.org/2015/listes-des-cooperatives-mini%C3%A8re-a-lest-de-la-rd-congo/>

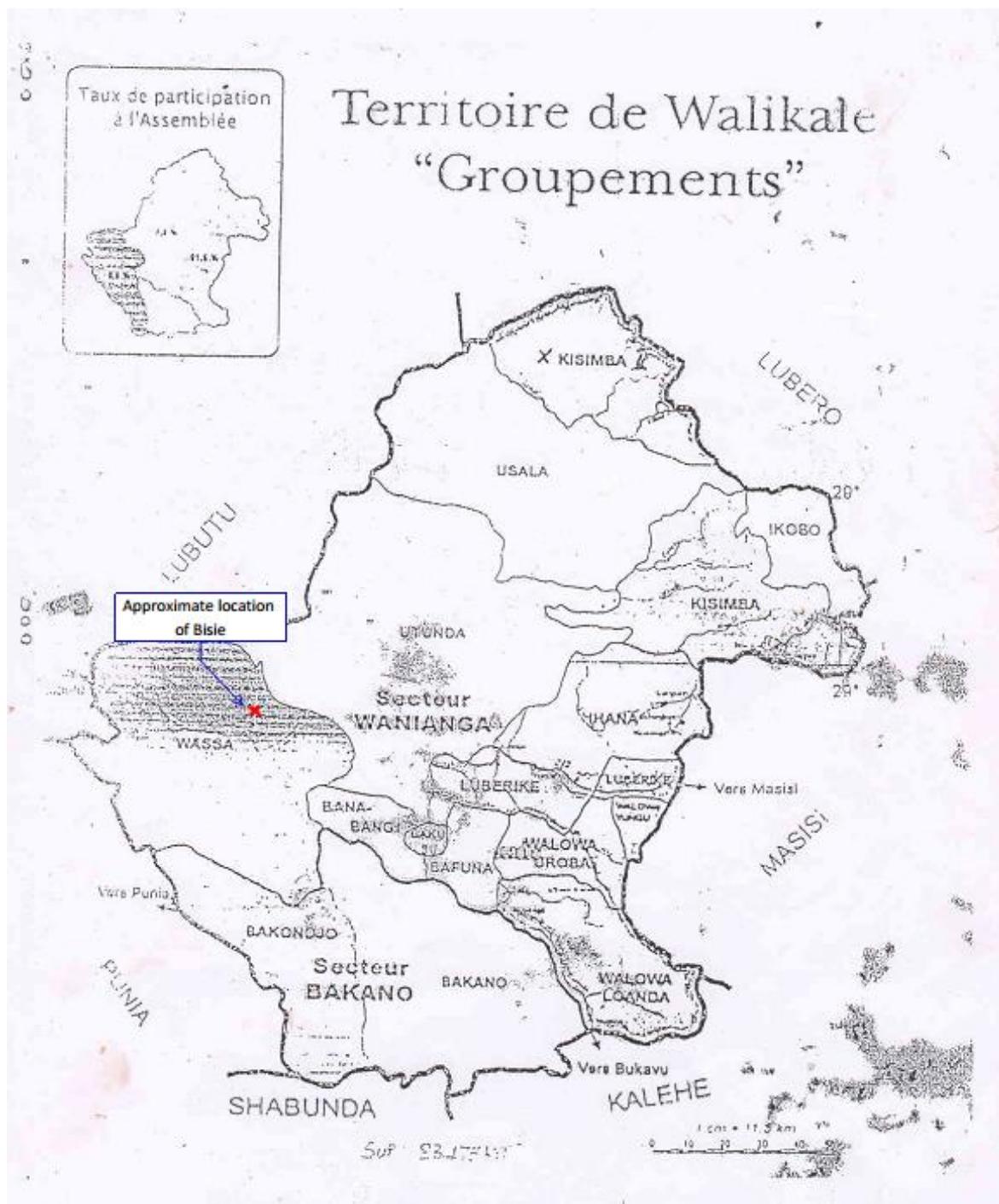
³ There is so far no precise date on when COMIDER started its operations in Bisie.

⁴ Information provided by ABM.

⁵ *Groupements* are the second smallest territorial entities in the DRC; they do have legal personality. A *groupement* comprises several villages and is part of a sector or chiefdom.

⁶ Prior to building his armed group, Sheka was working at Bisie site as member of COMIMPA cooperative.

Bisie site to...	Distance (as the crow flies)
Ihana	~50 km
Utunda	~5 km
Kisimba	~80 km
Usala	~55 km
Luberike	~65 km
Banabangi	~50 km
Bakusu (Walikale town)	~65 km
Bakandjo (Bakano sector)	~65km



Source: Administrative authorities of Wanianga sector

3.2 Armed groups

a. Non-state armed groups

Nduma Defense Congo (NDC) « Mai Mai SHEKA »

This rebel group was formed in June 2009 by long-time minerals businessman Ntabo Ntaberi Sheka in Walikale Territory, allegedly to “promote development” in the territory and to “free the mines” from the government control.⁷ As mentioned above, before forming an armed group, Sheka was working at Bisie site within COMIMPA cooperative; while FARDC were controlling the area and extorting the population, including miners.⁸ To fight against that, at the beginning of 2009, Sheka started to attack traders between Njingala and Bisie or between Mubi and Bisie, at a time when large amounts of money were flowing into Bisie. As a result, FARDC started operations to arrest Sheka, forcing the latter to hide in forested areas. Thus began the creation of the armed groups, whose members were recruited by Sheka among the local population of isolated villages, before starting an alliance with FDLR. NDC Sheka finally attacked Bisie on 2 August 2009, forcing 85th brigade of FARDC to leave the site.⁹

To extend his armed group, Sheka also mobilised FARDC soldiers who deserted the 85th brigade and the military FARDC base in Biruwe (territorial base for the coordination of national military operations against armed groups). Since its creation and until now, the number of members of NDC Sheka ranged between 70 and 180 according to different sources.¹⁰

Between 2009 and 2010, the NDC Sheka had established their headquarters in the localities of Wango and Nkutu, located respectively at one and a half and four hours’ walking distance from Bisie site. Nevertheless, the NDC Sheka were characterized for its high mobility, moving from site to site. They controlled the following mine sites, all located in Utunda *groupement*, Walikale territory:

- Gold site of Omate, located within one day’s walking distance from Bisie site;
- Gold site of Mundjuli, located at three day’s walking distance from Bisie site;
- Gold and cassiterite mine site of Angoa, located within one day’s walking distance from Bisie site.

The sketch below indicates the approximate locations of the different places and sites mentioned above.¹¹

Throughout the years 2009-2013, Sheka built several alliances. He first made an alliance with FDLR in 2009, before turning against them in 2011. During the absence of FARDC from Bisie from March 2011 to February 2012 Sheka was able to gradually establish greater control over Bisie (April 2011 – August 2011), before taking full control over the site (August 2011 – February 2012). In September 2011, it is alleged that Sheka had FDLR “Colonel” Evariste Kanzeguhera alias “Sadiki” killed.¹² Since then, the NDC Sheka have fought against the FDLR. Sheka was then allied to the M23 rebel group and allegedly received financial support from Rwanda. NDC Sheka was also reportedly supported by some FARDC officers who delivered him weapons, munitions, and confidential information on army operations (see chapter on FARDC below).¹³

Sheka has been allegedly responsible for numerous human rights violations, including torture, rapes, abduction, and killings, mostly in the Walikale territory between 2009 and 2013, but also in the Lubero territory in 2014. As a result, Ntabo Ntaberi Sheka was listed on 28 November 2011 on the UN sanctions list,

⁷ Human Rights Watch 2015: 3.

⁸ No information on the basis, amount and regularity of payments made.

⁹ Information collected by iTSCi staff during interviews with ANR and FARDC, November 2015.

¹⁰ The final report of the UN Group of expert from November 2010 mentions that the group never exceeded 70 combatants ; while a report by IRIN from October 2013 talks about 150-180 men. According to estimates from FARDC and ANR collected in November 2015, the group currently allegedly comprises 150 elements.

¹¹ Please note that there is no scale available on this sketch.

¹² UN Group of Expert 2012: Addendum to the Group’s interim report.

¹³ Human Rights Watch 2015: 4-7.

being therefore subject to a worldwide travel ban and asset freeze.¹⁴ Events in Lubero territory are not relevant for this present report, as the territory is located far away from Bisie site (~ 120 km as the crow flies from Bisie site to the border between Walikale and Lubero territory). While some reports mention that NDC Sheka has no specific ethnic affiliation¹⁵, it seems more likely the opposite. Indeed, others concordant reports show the multiple exactions perpetrated by Sheka against the Hunde ethnic group committed in or around the city of Pinga in 2012 until November 2013, when they abandoned their base in Pinga.¹⁶ Moreover, as mentioned several times in this reports, information collected by iTSCi showed that the members of NDC Sheka were reportedly from the Nyanga ethnic group and were the enemy of the Nkumu group.¹⁷

MONUSCO launched a military operation against the NDC Sheka in July 2014, resulting in the dislodgement of the rebel groups from Luberike, Wassa and Ihana *groupements* (located 50 km, 5 km, and 40 km¹⁸ respectively from Bisie site).¹⁹

MAÏ MAÏ SIMBA

The Maï Maï Simba are said to be the oldest Congolese armed group with origins dating back to 1964.²⁰ Led by “General” Mando Mazero and “General “Lucien Simba”, the rebel group aims to protect the customary division of the land against any foreign or local armed groups. The Maï Maï were carrying out mining activities in Bisie since 2002. They were affiliated to the Nkumu ethnic group, close to the COCABI cooperative. In addition to illegal mining at Bisie, they were also involved in poaching in the Maiko National Park.²¹ The rebel group is based in the Wassa groupement in the administrative sector of Wanianga, Walikale territory, as well as in the Maiko National Park in the Lubutu territory, province of Maniema. According to estimations of ANR and FARDC, the rebels are today more than 800; although, according to interviews carried out by iTSCi staff in November 2015 with MONUSCO, these estimates are too high; the total number of armed groups who are today still active in Walikale territory reportedly representing approximately 300-400 rebels.

Today, the Maï Maï Simba are still active, and are reportedly located at the border between Walikale territory and Maniema Province, near the Maiko National Park in the North Kivu and Maniema Provinces. According to interview with FARDC members, Maï Maï Simba are not a priority for them, as they do not attack any FARDC position or bases. However, according to FARDC and ANR, the rebel group is still committing some abuses against local populations, mainly thefts. Since the iTSCi programme has been implemented in Walikale territory from March 2015, no security cases involving the Maï Maï Simba were reported at or close to iTSCi sites or to Bisie site or on the mineral transport routes.

FDLR/FOCA

The *Forces Démocratiques pour la Libération du Rwanda* (FDLR) were funded by some of the key perpetrators of the 1994 genocide in Rwanda. It is led by the Generals Mudacumura and Mugisa. The FDLR/FOCA faction is known for having always conducted illegal mining activities at gold sites in the Utunda and Kisimba *groupements*, Walikale territory, as well as in Lubero territory; which represents their main source of income. They are also responsible for looting local villages. According to a report from IRIN dated October 2013, the FDLR/FOCA comprise between 1,500-5,000 rebels²², while FARDC and ANR sources in Walikale mentioned approximately 600 rebels currently active. Their overall objective is to destabilize the established power in Rwanda.

¹⁴ <https://www.un.org/sc/suborg/en/sanctions/1533/materials/summaries/individual/ntabo-ntaberi-sheka>

¹⁵ IPIS and International Alert 2010: 27.

¹⁶ Human Rights Watch 2015: 4-7.

¹⁷ Interviews conducted by iTSCi with FARDC, ANR, civil society.

¹⁸ Approximate distance calculated between Bisie site and the border of the *groupement*, as the crow flies.

¹⁹ IPIS 2015: 30.

²⁰ IRIN 2013.

²¹ Interviews conducted by iTSCi in November 2015.

²² IRIN 2013.

Other armed groups

According to MONUSCO, FARDC and ANR²³, the overall security situation today remains volatile in the Walikale territory, with the presence of different armed groups located in different *groupements* and regularly moving from place to place. They are responsible for committing abuses against the local population; clashes among those armed groups are also reported. The estimates of the number rebels in each armed group differ significantly between MONUSCO, which mentioned approximately 400 armed people in total, and FARDC/ANR, which provided higher estimates, as shown below:

Name of armed group	Location	Numbers of members	Comments
NDC rénové of Guidon Mwuissa Shimiray	Utunda, Wasa, Ihana, and Usala <i>groupements</i>	~300	
APCLS, led by Janvier Buingo Karayiri	They are reportedly mostly located in forested areas close to the Walikale-Masisi road (Ihana and Lubelike <i>groupements</i>)	~600	
MAC (Mouvement acquis pour le changement) of SHEMAKINGI MBULA	Walowa-Yungu <i>groupement</i>	~150	
FDC (Force Défense du Congo) of BAABO NGABO CHARLES	Walowa-Yungu <i>groupement</i> and in Masisi territory	~200	
Maï Maï Kifuafua of Colonel DELPHIN MBAENDA	They are reportedly located in or near the Kahuzi Biega National Park, between Walikale territory and the South Kivu province, i.e. at several days' walking distance from Bisie site.	~1,800	The Maï-Maï Kifuafua are mainly from the Nyanga ethnic group.
Raïa Mutomboki, Isangi group	Bakano <i>groupement</i>	~600	
Raïa Mutomboki, Binakwa group	Bakano <i>groupement</i>	~150	
Raïa Mutomboki, SHEBITENDE NTOTO group;	Walowa-Uroba <i>groupement</i>	~60	They are today allied with the Maï-Maï Kifuafua.
FDLR/FOCA	Ikobo, Kisimba and Usala <i>groupements</i> , as well as in Lubero territory	~600	They are being attacked by NDC Sheka since their alliance broke down in 2012; All these attacks are not always reported by the authorities, due to their minor nature.

²³ Interviews conducted by iTSCi in November 2015.

b. State armed groups

FARDC 85th Brigade

A unit from the 85th Brigade arrived at Bisie in the course of the year 2006; while the Brigade itself was based in Walikale town. **At the beginning of 2006**, FARDC Colonel Samy Matumo from the 85th brigade took command of the Walikale territory, including Bisie site. This brigade comprising 12 soldiers was mostly composed of ex-Maï Maï rebels.

FARDC 1st and then 212th brigade

In March 2009, this brigade was replaced by the 1st brigade composed of integrated CNDP members (Congrès National pour la Défense du Peuple), which was later renamed 212th Brigade under the command of Captain Zidane. During Pact's first visit in Bisie, in June 2010, Pact staff witnessed a significant number of FARDC personnel at the mine and also on the path from Bisie to Njingala.

The 212th brigade of FARDC also started to be involved in several cases of looting causing insecurity in Bisie and along the Bisie-Njingala route. Moreover, two FARDC were allegedly supporting and cooperating with the NDC Sheka: Colonel Mboneza from the 212th regiment and Colonel Innocent Kayina from 25th Brigade which was based in the Walowa-Loanda *groupement*, southeast of Walikale town.²⁴

FARDC 1213 Amani Leo integrated Battalion

On 1 August 2010, the 212th brigade of FARDC was replaced by the 1213 Amani Leo integrated Battalion – which also included integrated CNDP members – under the command of Colonel Ibony and comprising approximately 400 soldiers. In March 2011, demilitarization of Bisie started and FARDC were forced to leave and hand over the security mandate to PMH – the mines police. There was no official presence of FARDC at the mine between March 2011 and February 2012 which led to deterioration of the situation until full control by NDC Sheka.

FARDC 803rd and 813th Regiments

The presence of FARDC was found to be required and FARDC 803rd Regiment, together with FARDC 813th Regiment dislodged the NDC Sheka from Bisie site in February 2012. Under the command of Colonel Pilipili, the 803rd Regiment, whose number of agents is unknown, was then based in Bisie to ensure security at and around the site.

FARDC 3415th / 904th Regiment and current FARDC assignments

On 3 September 2012, it was replaced by 3415th Regiment under the command of Colonel Akili Shemondo, who is also known as “Mzee Wa Meno”. FARDC soldiers were deployed at the different barriers along the Bisie-Njingala path to ensure security. Five soldiers were also based in Bisie. In April 2015, the 3415th Regiment was renamed 904th Regiment. Today, there are still 5 FARDC on the Bisie-Njingala path and 10 FARDC in Manoiré. There is no precise information on when the number of agents changed.

Today, there are approximately 20 armed FARDC located in Alphamin concession. They are securing the area against potential armed groups, as part of their regular mission, and thus carry out inspections rounds within the concession. They come from the military basis of Biruwe, which works independently from the FARDC sector in charge of Walikale territory. This military basis is therefore not structured in regiments; they rather come from the DRC National Army General Staff. These soldiers rotate approximately every three weeks.

²⁴ On the 25th Brigade, see the final report of the UN Group of Experts from 2009. According to information from media reports ([here](#) and [here](#)) and from the UN Group of Experts (final report from 2011), Colonel Kayina became in 2011 FARDC Commander of the 805th Regiment based in Rutshuru territory (located next to the Ugandan-Congolese border, North Kivu province), before deserting in April 2012. Both Colonels Kayina and Mboneza joined the M23 armed group. After the dissolution of the armed group, both colonels were excluded from reintegrating into the FARDC (see the communiqué from the government: [http://www.digitalcongo.net/UserFiles/file/PDF_files/2013/communique_gouv_m23_nongrata\(1\).pdf](http://www.digitalcongo.net/UserFiles/file/PDF_files/2013/communique_gouv_m23_nongrata(1).pdf))

While FARDC is today still present in Bisie, they are no reports of conflicts, human rights violations or else involving these agents. According to the Congolese NGO CREDDHO present in Bisie, FARDC agents are not involved in any illegal tax collection or else in Bisie. Their presence is reportedly justified by the fact that there are still active armed groups present in the region – although not in the vicinity of Bisie site. Their presence aims to prevent incursions by armed bandits or groups, and to collect information on potential movements of armed groups. Moreover, FARDC is not located within the perimeter of the pits, but on top of a hill, approximately 50 meters from Manoiré village.

PMH (Police des Mines et Hydrocarbures)

PMH is the legitimate mining police which represent a department of the Congolese National Police PNC. They are mandated by Congolese law to secure mining areas. Their role consists in overseeing mining activities. In this regard, PMH agents are allowed to access every mining site in the DRC.

In Eastern Congo, PMH officers had the mission to demilitarize mine sites, replacing the army by mining police agents, thus ensuring civilian control over the mineral trade, instead of a military one.²⁵

In April 2008, Colonel Serushago, former Commander of Provincial PMH Battalion in North Kivu, undertook a mission in Bisie and established a PMH unit in Bisie. He named Captain Irebu to take command of this 12-men unit. Captain Irebu was seconded by Bihango Dunia.

In 2010, a PMH unit of 10 policemen was in Bisie under the command of Assani Assumani.

Between September 2010 and March 2011 – official suspension of mining activities by the DRC government – all PMH agents left Bisie site.

In March 2011, the control of the major mining sites, including Bisie, as well as the two trading centres, Ndjingala and Mubi, was taken over by PMH. Around 30 to 40 PMH police were then present at Bisie.²⁶ This was not effective in controlling security as mentioned above. According to interviews from stakeholders, PMH was still at the site from August 2011 until February 2012, i.e. when NDC Sheka was controlling Bisie. However, there were allegedly no attacks from NDC Sheka against PMH.

From February 2012 on, PMH was based in Bisie with 18 agents under the command of Commander Dunia Ruyange.

In 2013, a new PMH unit was deployed in Bisie under the command of Commander Jean-Pierre Mutombo and comprising 12 policemen. This remains the case to date.

In addition, a PMH unit of 30 policemen is also based within Alphamin concession since Alphamin has been granted its exploitation licence in February 2015. The unit is under the command of PMH Commander Major Kabaka.²⁷

There are no reports of illegal payments or tax collection involving PMH.

There have been allegations against the actions of PMH in March 2015 when chasing miners from Camp 45' as per the Provincial Minister's order that artisanal mining should not continue on site, however an official public investigation concluded that PMH agents reportedly only fired in the air because miners had weapons on-site (including an AK-47 and two Uzis) and those miners had first started to shoot on policemen, using women as human shields. Two miners were arrested. .²⁸

²⁵ <http://www.enoughproject.org/blogs/congo-army-takes-over-key-mines-now-must-hand-over-police>

²⁶ IPIS 2011: 10.

²⁷ Interview with the Commander of the PMH in Walikale, November 2015. Follow up calls made in January 2016.

²⁸ For more details, refer to the table page 5 below.

PNC (Police Nationale Congolaise)

The mission of the Congolese National Police PNC is to ensure public safety, to safeguard the physical integrity of people and to ensure the security of their property throughout the national territory, as per article 182 of the DRC constitution. In this regard, the PNC is also deployed around Bisie, in Manoiré village, and is responsible for maintaining public order and public security of the population.

From 2004 on, six PNC agents were present in Manoiré village under the command of Dunia Bihango, with the mandate of securing the local population.

At the beginning of 2008, the PNC Provincial Commander in North Kivu deployed 33 PNC agents in Bisie to assist in improving security for MPC, under the leadership of PNC Captain Michel Ndolomongo and seconded by Deputy Commander Maliavu. Clashes occurred between PNC District Commander Blaise Dimundu Kiasi and Deputy of FARDC 85th Colonel Samy who was at that time controlling the site and involved in extortion. Some stakeholders alleged that MPC agents were sent to different pits to purchase minerals, which was increasing the already existing tensions between the different forces at the site (PNC and FARDC).²⁹

In **August 2009**, on an occasion when NDC Sheka attacked Bisie, all PNC agents left the site.³⁰

There is so far no precise information on when PNC returned to Bisie site. PNC agents were reportedly present in Bisie in August 2013, when Maï-Maï Simba arrived at the site (see below). Today, according to observations by iTSCi staff, there are three PNC agents. There are no reports of conflicts, human rights violations or else involving these agents.

During the presence of both PMH and PNC agents at Bisie site since 2008, there was no report of conflicts or interference between these two public security services.

4. OECD Annex II RISK ASSESSMENT

a. Serious abuses associated with the extraction, transport or trade of minerals

According to a report of Global Witness, cases of forced labour were taking place in Bisie when the mine site was under control of FARDC. In **November 2007**, for instance, FARDC was forcing miners to enter the mineshafts and to work, despite dangerous conditions and early signs of potential accidents. As a result, on **15 November 2007**, a mineshaft collapsed, resulting in several fatalities.³¹

Reports of torture, sexual abuses, and forced labour are also reported during the time when Bisie site was under control of FARDC Colonel Samy from the 85th Brigade (between 2006 and March 2009). Such abuses were also committed by FDLR rebel in the Walikale territory (and beyond)

From **July to September 2010**, the NGO Free the Slaves carried out interviews of 354 men, women and children in the Bisie mine. According to their findings, several instances of mass forced recruitment, enslavement and torture were reported by miners, when Bisie was under control of 212th Brigade of FARDC. Youth from surrounding villages were reportedly recruited by force at night by FARDC and brought to Bisie, where they had to work under armed guards. They were reportedly not paid.³²

Instances of the worst forms of child labour, other forms of child labour and of recruitment of child soldiers by both FARDC and non-state armed groups were also reported. At Bisie, children 14 years of age and older were reportedly performing a wide range of tasks: digging, drying and transporting minerals, selling goods, supervising trade, building small structures, working as bodyguards or carrying out enforcement in the mine on

²⁹ Interview with the Commander of the PMH in Walikale, November 2015. Interview with FARDC Colonel in Bobolo, November 2015.

³⁰ See table part 5 below.

³¹ Global Witness 2009: 28.

³² Free the Slaves 2011.

behalf of their superiors. Girls were also exposed to sexual exploitation by mine operators and soldiers.³³ **Between 2007 and 2012**, research undertaken in Walikale territory also found instances of children working at the pits, for instance extracting minerals.³⁴ These findings are based on several missions carried out at the mine sites of Bisie, Omate, Muchele and Kalay Boing some of which are for gold, at the following months: June and November 2007; June, August, September and October 2008; May 2009; September and December 2010; and March and December 2012. While the report does not differentiate its finding according to the mine sites, it provides testimonies from eleven children collected in Bisie from **15-18 December 2012**. These children were reportedly involved in general child labour, selling foods, or small equipment; fetching and selling water; or working as warehouse guard. Among them, two boys of 16 years old testified that they were working as diggers in Mpama/Golgotha or looking for minerals at Mumbrosse pit.³⁵

Since the beginning of 2012, when state security forces retook control over Bisie, there was no report or evidence of cases of forced or compulsory labour, forms of torture, cruel, inhuman and degrading treatment, and gross human rights violations and abuses (e.g. sexual violence). During Pact's field visit in **November 2015**, no reports, testimonies or evidence were collected from local NGOs or the civil society on human rights abuses or violations, including on the worst forms of child labour committed since February 2012 and related to the extraction, transport and trade of minerals in Bisie.

Other allegations of some instances of human rights abuses or violations, as described in the main part of this report, however, should be taken into account (see chapter 5 on security assessment).

b. Bribery, money laundering, and fraudulent misrepresentation of the origin of minerals

The UN Group of Expert (UN GoE) indicates that in 2009, minerals from Bisie were evacuated from trading centres near Bisie and Walikale, transported to Goma by road via Kisangani and Beni, before being then trafficked into Rwanda.³⁶ In their report from July 2013, the UN GoE further highlights that minerals from Bisie continued to be smuggled to Goma and Bukavu. These activities reportedly occurred with the support or involvement of local civil and military authorities.³⁷ These cases concern minerals that have already been transported and smuggled from Bisie site and are therefore not relevant for this report or for the overall tagging process of residual stocks in Bisie.

According to the different information collected and reviewed by Pact, there is no evidence that minerals from other sites have been transported to and stored in Bisie. Two main factors reinforce this statement: Bisie being one of the largest tin mine in the region (and the DRC), minerals are easily found at the site and were not accepted in formal supply chains; the difficult geographic conditions – absence of roads and long distance between sites – require miners to transport minerals by foot and therefore make such options economically not viable.

c. Direct or indirect support to non-state armed groups or to public or private security forces

The remainder of this report mainly focuses on risk assessment of such risks as depicted in the Annex II of the OECD Due Diligence Guidance. They are largely documented in chapter 5 and 6 of the present report.

³³ Ibid.

³⁴ IPIS 2013.

³⁵ Ibid: 22-25. Golgotha corresponds to the 15 minutes site; while Mumbrosse is one mineshaft located at the 45 minutes site.

³⁶ UN GoE, final report, November 2009: 50.

³⁷ UN GoE, midterm report, July 2013: 40.

5. SECURITY ASSESSMENT

a. Before March 2011 (expected to be prior to mining of stock)

Description of events

Since 2002 and the discovery of Bisie site, all minerals exploited fell under the control of the RCD³⁸ and, from 2003 on, of the newly created FARDC. Due to the close ties between the RCD and Rwanda and the fact that part of its members were from Rwanda, these agents were commonly called “Mungore”, which designates FARDC soldiers in general in Kinyarwanda. At that time, all minerals were reportedly transported to Rwanda via Walikale, Masisi, and Goma.

In 2004, MONUSCO started an observation mission in Walikale territory. They established a base in Walikale town in 2005, including military, diplomatic and civil departments. Their principal mission consists in protecting civilians against any kind of violence committed by armed groups, fighting armed groups, and re-establishing the state’s authority.³⁹

At the beginning of 2006, FARDC Colonel Samy Matumo from the 85th brigade took command of the Walikale territory, including Bisie site. This brigade was mostly composed of ex-Maï Maï rebels.

At the end of 2007, MPC’s facilities were attacked and partially destroyed. These were repaired and exploration work recommenced.⁴⁰

At the beginning of 2008, the PNC Provincial Commander in North Kivu deployed 33 PNC agents in Bisie to assist in improving security for MPC, under the leadership of PNC Captain Michel Ndolomingo and seconded by Deputy Commander Maliavu. Clashes occurred between PNC District Commander Blaise Dimundu Kiasi and Deputy of FARDC 85th Colonel Samy who was at that time controlling the site and involved in extortion. MPC ceased purchasing from Bisie in 2006⁴¹, although some other stakeholders allege that MPC agents were sent to different pits to purchase minerals and that increased the already existing tensions between the different forces at the site (PNC and FARDC).⁴²

During 2008, the MPC camp was again attacked and destroyed. MPC applied for Force Majeure over the licence which was granted in 2009. From the 2008 attack through to the lifting of Force Majeure in 2012 there were no MPC staff at Bisie apart from two people who looked after what remained of the MPC facilities.⁴³

From March 2009, the 1st brigade of integrated CNDP members (Congrès National pour la Défense du Peuple), which was later renamed 212th Brigade under the command of Captain Zidane took control of Bisie site. According to several reports, this Brigade was partly controlling mining activities, including illegally collecting taxes.⁴⁴

At the time of the transition from 85th to 212th Brigade of FARDC, many soldiers of the 85th brigade deserted and joined the newly formed rebel group NDC Sheka.

³⁸ RCD (Rassemblement Congolais pour la Démocratie) was a Congolese rebel group present in the Kivus between 1998 and 2003. It was then integrated into the regular Congolese army FARDC.

³⁹ During meeting with representative of MONUSCO in Walikale and iTSCi in November 2015, it was notified that MONUSCO reports on Bisie could only be shared with iTSCi by order of the Special Representative of the UN Secretary-General in the DRC.

⁴⁰ Information provided by ABM.

⁴¹ Information provided by ABM.

⁴² Interview with the Commander of the PMH in Walikale, November 2015. Interview with FARDC Colonel in Bobolo, November 2015.

⁴³ Information provided by ABM.

⁴⁴ The final report of the UN Group of Experts published in November 2009 mentions that local military commanders at Bisie could earn up to \$60,000 per annum from illegal tax collection.

Between June and August 2009, first attacks by the NDC Sheka were reported at the principal mine sites in Obaye, Omate, and Bisie. Its fight for taking control of Bisie site culminated in the massacre of up to 30 people on 13 August 2009, perpetrated by both FDLR and NDC Sheka rebels; following which FARDC increased its presence at Bisie site.

Since the beginning of 2010, mining and trade activities have been repeatedly disrupted by FDLR associated with NDC Sheka, and by 212th Brigade of FARDC.

From 30 July to 2 August 2010, NDC Sheka and FDLR allegedly attacked 13 villages along the Mpofi-Kibua axis⁴⁵ in Walikale territory; 387 rapes were reported.⁴⁶ Moreover, 116 people were reportedly abducted and subjected to forced labour.⁴⁷ According to MONUSCO report, these numbers are likely underestimated.⁴⁸

On 1 August 2010, the 212th brigade of FARDC, which had started to be involved in several cases of looting causing insecurity in Bisie and along the Bisie-Njingala route, was replaced by the 1213 Amani Leo integrated Battalion with 400 men, including former CNDP members who had integrated into the FARDC, and under the command of Colonel Ibony. However, similar cases of insecurity and looting were also perpetrated by the soldiers of this Battalion. During the first Pact mission in Bisie in June 2010, Pact staff saw the presence of numerous FARDC soldiers in and around Bisie.

Between October 2010 and March 2011, mining activities were officially suspended by the government. The ban was announced by President Kabila, likely due to international pressure on the DRC government to end the financing of conflicts through mining following the publication of Dodd Frank. The suspension of all mining activities concerned the provinces of North and South Kivu and Maniema. The ban was also announced after reports on mass rapes allegedly committed by NDC Sheka and FDLR in Walikale territory at the end of July 2010.

FARDC soldiers of the 1213 Amani Leo Battalion remained in Bisie; while PMH left the site. There were no government agents at the site.

Type of violations before March 2011

At the mine

- Control of the mine and extortion of population by FARDC: The Group of Experts has obtained documents and testimonies from government mining officials in Walikale claiming that out of every 2,000 Congolese Francs taken on each 50 kilogram sack of cassiterite mined, 1,000 Francs are given to security officials, and 30 to 40 per cent of that sum goes to FARDC.⁴⁹ According to the information provided above, different FARDC brigades were involved in extortion: 85th Brigade, 212th Brigade, and 1213 Amani Leo Battalion. These violations have therefore likely continuously taken place during the entire period between 2006 and March 2011, when FARDC was present at Bisie site. A report by Global Witness mentions that in 2007 and the first part of 2008, FARDC were collecting “at least 120,000\$ a month by taking a commission of 0.15 \$ on every kilogramme of cassiterite”⁵⁰.

On the transport route

- In 2008, there were reportedly at least eight checkpoints on the path between Bisie and Njingala, at which the military was requiring payments in kind or in cash by all people transporting goods, including minerals.⁵¹

⁴⁵ Mpofi and Kibua are located between Walikale town and Masisi town.

⁴⁶ The Enough Project 2004: 10.

⁴⁷ IPIS 2011: 4-5.

⁴⁸ MONUSCO 2011: 13.

⁴⁹ UN GoE, final report, November 2009: 30.

⁵⁰ Global Witness 2009: 6.

⁵¹ Global Witness 2009: 29-30.

- Between March 2009 and August 2010: Researchers uncovered mass forced recruitment, enslavement and concealment of evidence by FARDC soldiers of the 212th brigade.⁵² There are similar reports of extortion and forced labour by 25th brigade of FARDC on 2 August 2010 in Kembe, located between Walikale and Mpofi.⁵³
- From September 2010 to March 2011: After the official suspension of mineral exploitation in the Kivu and Maniema provinces, FARDC soldiers reportedly initiated forced recruitment of miners in night-time raids on the town of Ndjingala. Village youth were forcibly recruited and brought to Bisie, where they were given army uniforms and put to work under armed guards in the mine shafts of Bisie hill. They could not escape nor were they paid for their work.⁵⁴

b. March 2011 – August 2011 (expected to be prior to mining of stock)

Description of events

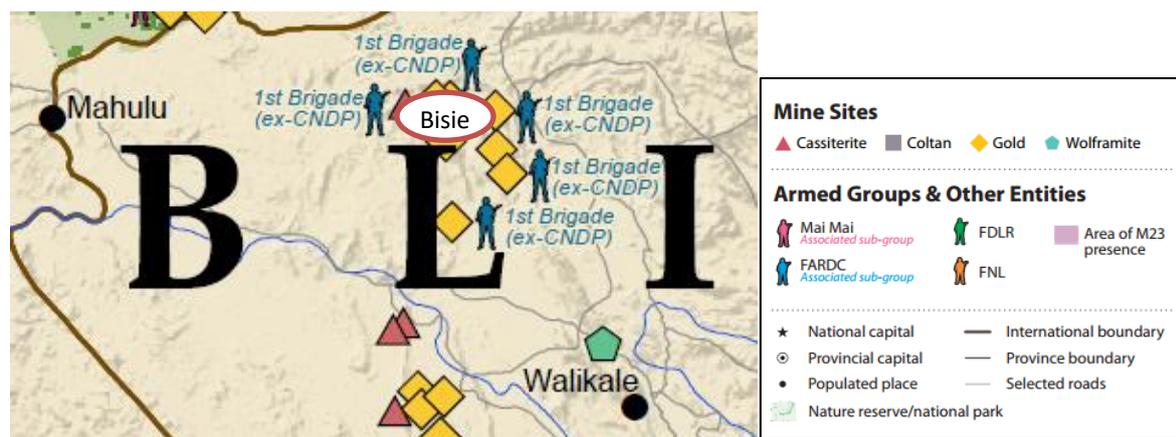
In March 2011, the suspension of mining activities was lifted. A demilitarisation process started in Bisie: FARDC were forced to leave Bisie site.

The control of the major mining sites, including Bisie, as well as the two trading towns, Njingala and Mubi, was taken over by the legitimate mining police (PMH). Around 30 to 40 PMH agents were then present at Bisie.⁵⁵

Between March and August 2011, NDC Sheka took profit of this vacuum to attempt to take control of Bisie.

On 26 April 2011, the coalition FDLR-NDC Sheka temporarily occupied the working sites of Bisie, where they extorted money from people and the chief of police. Apparently, the rebels were able to occupy the site without any resistance from the mining police, who retreated from the scene. The local police authority at Bisie stated that the mining police do not have the required means to secure the area properly.⁵⁶ The US State Department failed to picture the presence of non-state armed actors in the zone, as demonstrated in the map below.

US State Department map, June 2011⁵⁷



⁵² Free the slaves 2011.

⁵³ MONUSCO. Rapport final des missions d'enquêtes du bureau conjoint des Nations unies aux droits de l'homme. July 2011, p. 15.

⁵⁴ Ibid.

⁵⁵ IPIS 2011: 10.

⁵⁶ IPIS 2011: 10. There is no precise information in IPIS report on whether the local police authority mentioned belongs to PNC or another state security service. This information is being checked.

⁵⁷ Note that blue persons represent FARDC, while pink persons represent non-state armed groups. Cassiterite is represented as red triangle. Note that the US Department highlights that "this map should not by itself be considered a source of sufficient information to serve as a substitute for the exercise of effective due diligence on companies' supply chains." The localisation of Bisie on the map is only indicative.

Type of violations between March and August 2011

At the mine site

- Control of the mine and extortion of population by NDC Sheka and FDLR

On the transport route

- No information

c. August 2011 – February 2012 (expected to be prior to mining of stock)

Description of events

On 6 August 2011, NDC Sheka launched a significant attack in Bisie, arriving at the site with 37 combatants.

On 14 August 2011, Sheka kidnapped the mining police commissioner, Mr Hassan Asumani, his deputy, Dunia, and a policeman. The latter two were released the next day, while Asumani was held hostage in Omate, a gold mining site now controlled by Sheka. Sheka used the kidnapping of Asumani to demand the release of four of his relatives in FARDC custody.⁵⁸

The rebel group managed to establish its headquarters in Bisie **by mid-November 2011**.⁵⁹ They however remained at the site only for a couple of months, until the FARDC retook control (see below).

Between August 2011 and February 2012, Sheka maintained relations with a mine manager named Ramazani and with customary authorities; he was allegedly collecting payments on minerals and forced contributions from miners. Sheka demanded that the 10% tax on minerals be channelled to customary leaders and installed a one-off tax of 20,000 FC per miner or mineral trader.⁶⁰ As previous member of COMIMPA cooperative, Sheka was more supporting this cooperative; while he was marginalising and discriminating to a larger extent against COCABI cooperative, whose members belong to the Nkumu ethnic group. He had no particular adverse treatment towards COMIDER cooperative, whose members generally belong, as Sheka, to the Nyanga ethnic group.

During that period, NDC Sheka maintained full control over the mine site.

Type of violations between August 2011 and February 2012

At the mine site

- NDC Sheka controlled Bisie and extorted the population, including miners during the overall period (August 2011-February 2012); In case of non-compliance, Sheka sent NDC elements to collect the taxes by force.⁶¹

On the transport route

- No information

d. February 2012 – March 2015 (relevant to mining of stock at the mine)

Chronology of events

In **February 2012**, the 4th sector of FARDC comprising 803rd and 813th regiment dislodged the NDC Sheka and retook control of Bisie. The NDC Sheka were forced to retreat with their allies FDLR to the *groupement* of Utunda I and Kisimba, located respectively 30 and 150 km from Bisie; whereas 803rd regiment of FARDC was based in Bisie under the command of Colonel Pilipili. The number of soldiers is unknown. According to local

⁵⁸ IPIS 2011: 10.

⁵⁹ The Enough Project 2004: 10; UN Group of Experts 2012: 36.

⁶⁰ UN Group of Experts 2011: 59-60.

⁶¹ Testimonies collected by iTSCI from ANR and FARDC, November 2015 and follow up in January 2016.

administrators and traders, security improved in the area⁶², which is confirmed by the fact that upon request, MPC SPRL was notified of the **lifting of the Force Majeure on 13 February 2012** by the Congolese mining register (*Cadastre Minier*).

In **March 2012**, an attack by road bandit known as “Chebutira” was reported on the Ndjingala-Bisie path, at approximately 3 hours’ walk from Njingala. Several goods were looted and people were raped.⁶³

Due to several attacks on the path, upon the request of artisanal miners who were victims of attacks between Njingala and Bisie, FARDC soldiers were deployed in 2012, on this transport route and established three checkpoints:

- In Musheba, a few kilometres from Njingala;
- In Mafilifili, approximately at equal distance between Njingala and Bisie;
- In Bisie, at the entrance/exit of Bisie.⁶⁴

Information collected by Pact during missions and interviews carried out in 2015, show that due to the prior concerns over the insecurity on the road from Bisie to Njingala, FARDC had a mandate of securing porters against potential attacks by armed groups along the mineral transport route. This structure remained until today. All stakeholders, including the territorial authorities, cooperatives, miners, porters and negociants agreed on payments to make to FARDC at the barriers to sustain their living and enable security to be provided. No report of human rights abuses by FARDC in this role has been obtained by Pact.⁶⁵

According to the NGO Global Witness, the army re-took control of the mine in February 2012 ostensibly to chase the NDC Sheka out, but allegedly taking the opportunity to control the mine. Global Witness received reports in March 2012 that the FARDC regiment was present in Bisie and illegally taxing the minerals production, rather than securing a perimeter and allowing the mining police to do their job in the mine itself.⁶⁶ They further affirmed that, army commanders have used incursions by the Mai-Mai Sheka into Bisie, the region’s most important mine, as a pretext to reoccupy it and exploit it illegally.⁶⁷ Finally, they stated that in North Kivu’s Bisie mine, for example, senior military officers no longer stationed on site have used family members as intermediaries to ensure continued control over specific mine shafts.⁶⁸ None of this information could be confirmed during Pact missions and interviews in 2015.⁶⁹ Instead, according to CREDDHO, a Congolese NGO present and active in Bisie since 2011⁷⁰, between February 2012 and March 2015, FARDC was not involved in any mining activities and did not collect or receive any taxes or fees at Bisie site from miners,

⁶² UN GoE, Interim report, Interim report from June 2012, p. 36: NDC had been dislodged from the area at the beginning of 2012 and the mine fell under Government control. According to local administrators and traders, Bisie had indeed come under FARDC control in the beginning of February.

⁶³ Testimonies collected by iTSCi from ANR and FARDC, November 2015 and follow up in January 2016.

⁶⁴ Testimony collected by iTSCi from the president of negociants of Walikale territory, November 2015.

⁶⁵ According to interviews carried out by iTSCi staff in November 2015 and January 2016, traders, cooperatives and porters agreed on these payments; while the civil society did not seem to have been involved in that process. This information was confirmed again during a meeting of the local monitoring committee CLS dated 25 January 2016, which iTSCi staff attended.

⁶⁶ Global Witness, ‘Coming Clean, How supply chain controls can stop Congo’s minerals trade fueling conflict,’ May 2012, pp.14-15. Global witness cited as source of information meeting with civil society and mining sector officials, 2012.

⁶⁷ Ibid: 22.

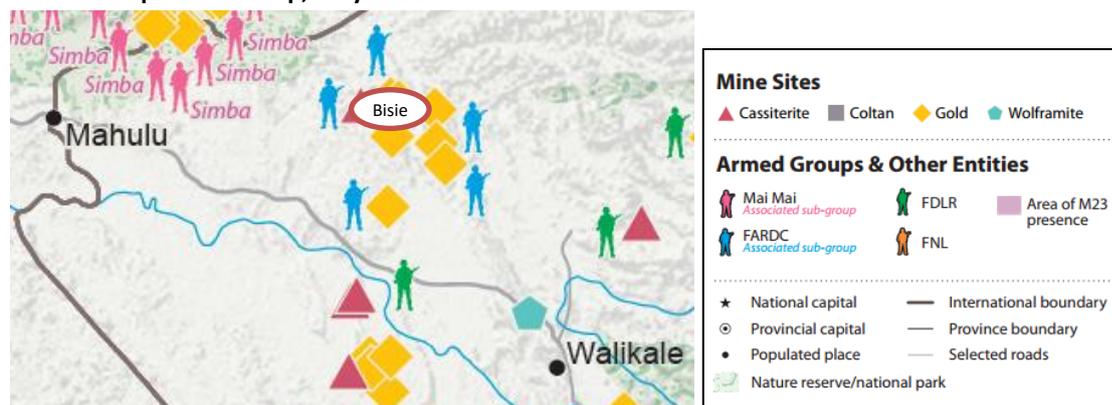
⁶⁸ Ibid.

⁶⁹ Testimonies collected by iTSCi from representatives of the civil society of Bisie, November 2015. Also, according to CREDDHO, between February 2012 and March 2015, FARDC was not involved in any mining activities and did not collect or receive any taxes or fees at Bisie site.

⁷⁰ CREDDHO (Centre de Recherche sur l’Environnement, la Démocratie et les Droits de l’Homme) was founded in 1998 in Goma and is present in various villages and localities throughout the North Kivu province. Their work focuses on democracy, human rights and environment. CREDDHO has also dealt with the topic of mining, by organising workshops and raising awareness of the population on the extraction, management and monitoring of mining resources, traceability, and governance, including in Bisie (<http://www.creddho-rdc.org/>).

traders, or cooperatives.⁷¹ As mentioned above, the FARDC military camp is not located within the perimeter of the pits, but on top of a hill, away from Manoiré village.

US State Department map, May 2012⁷²



In **May 2012**, the US Department of State shows that there is no non state armed group present in Bisie.⁷³ FARDC from the 813th regiment were present in Bisie. The map does not include information on insecurity on the route from Bisie to Ndjingala, from the road attacks by armed bandits (rather than armed groups), who stole goods and money of porters, as reported during interviews carried out by iTSCi, and from whom the FARDC provided protection.

At the beginning of September 2012, a qualification and validation team was asked to travel to Bisie to qualify the site. The mission was cancelled due to reports of insecurity cases in the general area of the territory of Walikale, about two thirds of which were at that time allegedly controlled by armed groups.⁷⁴

On 3 September 2012, clashes were reported at Angoa site, Utunda *groupement*, between NDC Sheka and FARDC, resulting in one civilian killed and another injured.⁷⁵ Angoa is located within one day's walking distance north from Bisie site. It is not located on the mineral transport route between Bisie and Njingala.

On 24 December 2012, FDLR reportedly looted Angoa site, Utunda *groupement*, taking with them goods and kidnapping 15 people. FDLR released them once they returned to the forest.⁷⁶

In **March 2013**, FARDC was allegedly still controlling mineral production at Bisie site. According to Global Witness reports, 'FARDC control of mineral production in Bisie persisted' with FARDC Colonel Mundos who was stationed in Mubi (located on the Walikale-Biruwe road, at approximately 30 km from Walikale town) and was collecting taxes and facilitating the transport of minerals out of Walikale territory.⁷⁷ This was not confirmed by information collected by Pact, as previously stated.⁷⁸

⁷¹ Interview with iTSCi.

⁷² Note that the Department highlights that "this map should not by itself be considered a source of sufficient information to serve as a substitute for the exercise of effective due diligence on companies' supply chains." The localisation of Bisie on the map is only indicative.

⁷³ Note that blue persons represent FARDC, while pink persons represent non-state armed groups. Cassiterite is notated as red triangle. Note that the Department highlights that "this map should not by itself be considered a source of sufficient information to serve as a substitute for the exercise of effective due diligence on companies' supply chains." The localisation of Bisie on the map is only indicative.

⁷⁴ IPIS Interview with representatives of Enough Project in Goma, quoted by OECD 2013, p. 23.

⁷⁵ Testimonies collected by iTSCi from representatives of state security forces in Walikale territory, November 2015.

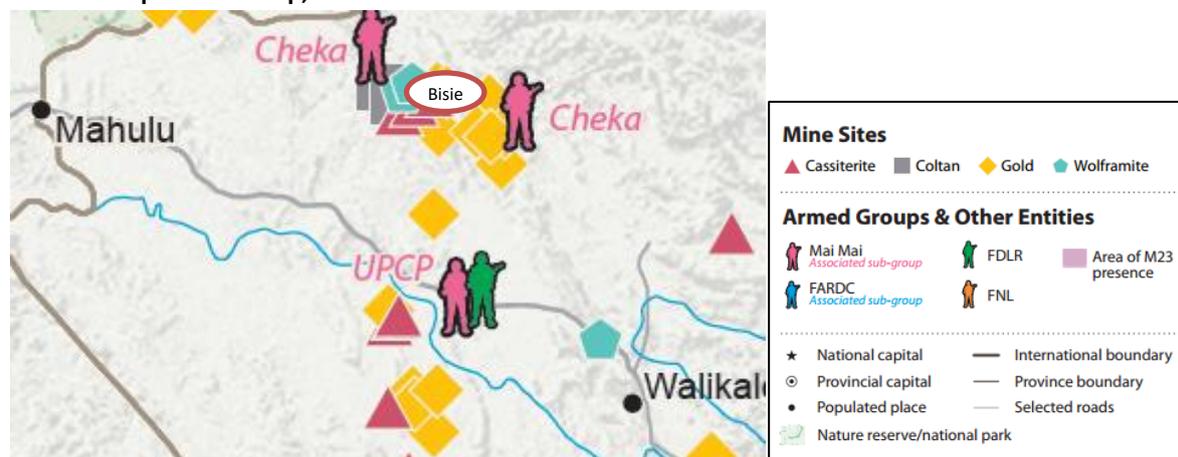
⁷⁶ Ibid.

⁷⁷ Global Witness 2013.

⁷⁸ Testimonies collected by iTSCi from representatives of the civil society of Bisie, November 2015.

During the second quarter of 2013, the security situation in Bisie deteriorated, due to ethnic conflict between the Nyanga and the Kumu ethnic group, respectively affiliated to the NDC Sheka and the Mai-Mai Simba armed group. Three events are worth mentioning, as listed below. There are no indications or reports showing that minerals were tampered with during this period.

US State Department map, June 2013⁷⁹



In **June 2013**, there was an alleged incursion of Simba rebels at Bisie.⁸⁰ There is no evidence of links with minerals or on illegal tax collection.⁸¹ Incursions of armed group were also reported in the US Department of States Conflict Map. However, contrary to what the US Department of State illustrates, Simba group was present, and not Sheka.⁸²

At the **end of August 2013**, 50 Simba elements arrived in Bisie apparently aiming to settle their problems with the Nyanga community. Goods were looted and three people were injured and goods looted. Due to this, the two PMH commanders (from the Nyanga ethnic group) deployed in Bisie, left the site. After that, all the policemen from this ethnic group left the site towards Walikale.⁸³

IPIS map, 31 August 2013



⁷⁹ Note that blue persons represent FARDC, while pink persons represent non-state armed groups. Cassiterite is notated as red triangle. Note that the Department highlights that “this map should not by itself be considered a source of sufficient information to serve as a substitute for the exercise of effective due diligence on companies’ supply chains.” The localisation of Bisie on the map is only indicative.

⁸⁰ See table part 5 below.

⁸¹ Report of the joint qualification mission dated 13 April 2014.

⁸² See table part 5 below.

⁸³ Testimonies collected by iTSCI from ANR and FARDC, November 2015 and follow up in January 2016.

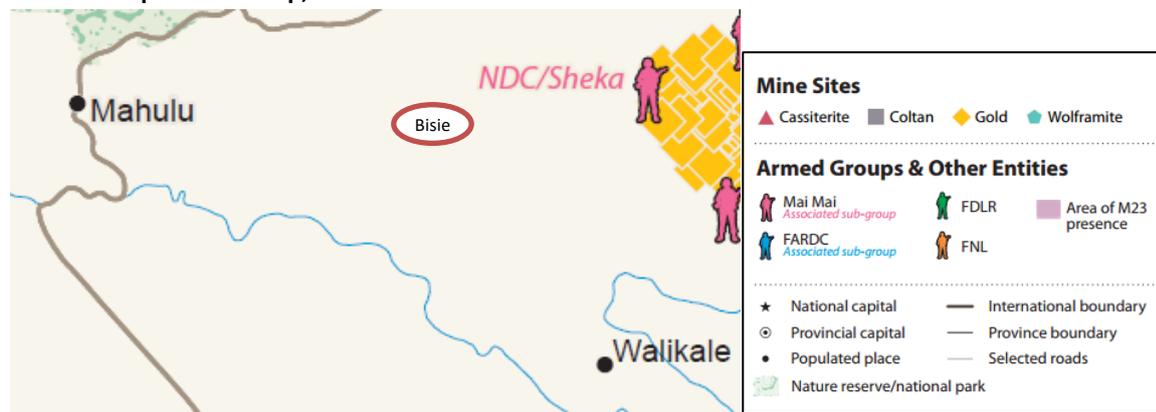
Contrary to the reports of Mai Mai Simba attacking Bisie site obtained from interviews and mentioned above; the map from IPIS only mentions the non-permanent presence of NDC Sheka. It also shows the presence of rogue FARDC involved in illegal taxation. These allegations have not been confirmed by local sources such as CREDDHO, as already stated before.⁸⁴

Between 8 and 10 September 2013, according to a news report, Mai Mai Simba abducted and killed at least eight people at Angoa site, including miners, farmers, and merchants. The killings seemed to have been prompted by the ethnic conflict between Nyanga and Kumu.⁸⁵

On **16 December 2013**, clashes were reported between Mai-Mai Simba and NDC Sheka at Kalay Boing site, located in Wasa groupement, resulting in one Simba rebel killed and one injured. At that time, Kalay Boing site – as well as Angoa site – was allegedly totally controlled and occupied by NDC Sheka.⁸⁶ These two sites are not located on the mineral transport route Bisie-Njingala.

On **9 March 2014**, unidentified bandits reportedly stole goods from ten women at Muchele gold site, located south of Bisie. There are no indications or reports of illegal tax collection on minerals along the mineral transport route.⁸⁷

US State Department map, March 2014



In **March 2014**, the US Department showed the presence of Sheka in the vicinity of Bisie, but much further away as the previous map above. However, this was not confirmed by the joint qualification mission in **April 2014**. Indeed, during this mission encompassing MONUSCO, Divimines, Mining Register, iTSCi, COMIMPA cooperative, SAKIMA, MPC/Alphamin, civil society, and ADECADEWA⁸⁸ the joint team assessed the situation in Bisie, among other sites. Their report, dated 13 April 2014, mentions the following points:

- Presence of FARDC, PMH, ANR, administrative authorities, and Divimines; the overall security situation was calm;
- It recommends accelerating deployment of FARDC soldiers in sufficient numbers to secure mine sites and the mineral transport routes over the whole territory of Walikale.

The report also mentions that several clashes between FARDC and NDC Sheka as well as between NDC Sheka and Mai-Mai Simba were reported during 2013 north of Bisie, in particular at the mine sites of Angoa, Kalay Boeing, and Kabombo.

⁸⁴ Testimonies collected by iTSCi from representatives of the civil society of Bisie, November 2015.

⁸⁵ <http://www.radiookapi.net/actualite/2013/09/17/nord-kivu-les-mai-mai-simba-tuent-8-otages-dans-la-zone-miniere-dangoa>

⁸⁶ Testimonies collected by iTSCi from representatives of state security forces in Walikale territory, November 2015.

⁸⁷ Ibid.

⁸⁸ ADECADEWA: *Association pour Défendre les droits des entités coutumières et des autochtones pour le Développement Endogène de Walikale* – Association for the Defense of traditional authorities and autochtones people for the endogenous development of Walikale.

On **15 March 2014**, six NDC Sheka allegedly contacted traditional authorities at Mucbele site; they asked the traditional authorities to inform FARDC that the latter should leave Bisie site and the surroundings.⁸⁹

On **14 April 2014**, there was an exchange of fire between FARDC and NDC Sheka at Kabombo site, north of Bisie, resulting in one FARDC soldier killed and leading to large population displacement towards Mubi and Njingala. There were however no reports or evidence of negative impact on mineral activities at Bisie, including no illegal tax collection on the transport route. Kabomba site is not located on the Bisie-Njingala path.⁹⁰

From **April to June 2014**, several cases of attacks by unidentified bandits on the path Bisie-Njingala were reported, during which goods were allegedly looted. There is no information on the nature of the goods stolen by these bandits. To protect the population, FARDC reportedly started to partly escort some negociants and porters to Bisie. In exchange, they received some payments from negociant or porters; although there are no details on the amount of money that FARDC allegedly received. These escorts reportedly stopped in June 2014, as calm had returned in the area. This information, collected from a representative of negociants in Mubi, was not confirmed by other sources in Walikale town or Njingala. As mentioned above, FARDC was at that time already deployed at several checkpoints between Bisie and Njingala.

In **July 2014**, NDC Sheka attacked the Alphamin site in Bisie. They attacked Alphamin facilities, resulting in one FARDC killed and three FARDC injured and causing significant damages.⁹¹ After this attack, a joint MONUSCO/FARDC offensive against the NDC Sheka successfully dislodged the armed group from a number of *groupements* (Luberiki, Wassa and Ihana).⁹² At this period, more FARDC were reported in the area, which allegedly created some fears among the population of Manoiré.⁹³ Arrest warrants were issued for eight cooperative members and the cooperatives were suspended from functioning in Bisie on the Alphamin concession by North Kivu provincial order no. 01/215/CAB/GP-NK/2014 dated 4 August 2014. An additional communication from the governor of North Kivu Julien Paluku was released on 29 August 2014 to clear the concession of all miners, which was only partially implemented following the attack in March 2015 (see below).

On **15 and 16 August 2014**, clashes between NDC Sheka and dissident NDC group led by Guidon were reported at the mine sites of Angoa and Kabombo, located in Utunda *groupement*. Six NDC Sheka rebels were allegedly killed.⁹⁴

After this last report of the attack by NDC Sheka in Bisie in July 2014, there are no more reports of non-state armed group presence in Bisie. Indeed, there are no new reports from Global Witness, Enough or the United Nations which have indicated recent activities in/around Bisie of armed groups.

However, tensions were present between miners and MPC/Alphamin. For instance, in **March 2015**, PMH agents reacted to the invasion of Camp 45' by artisanal miners and chased them away as per the Provincial Minister's order that artisanal mining should not continue on site. The PMH reportedly fired in the air because miners had weapons on-site (including an AK-47 and two Uzis) and those miners had first started to shoot on policemen, reportedly using women as human shields. While other versions of the events exist, the official investigation concluded the above with two miners then arrested. There are however no reports of minerals involved or tampered during these events. All miners eventually left the pit 45 minutes, which is today not

⁸⁹ Testimonies collected by iTSCI from representatives of state security forces in Walikale territory, November 2015.

⁹⁰ Ibid.

⁹¹ All MPC/Alphamin expatriate and local staff, along with PMH, fled the camp and were apparently rescued 50 kilometres away over subsequent days. According to MPC/Alphamin, the attack resulted in \$12-14 million worth of materials destroyed, and reports persist of alleged involvement of cooperatives and even local civil society in organizing and carrying out the attack.

⁹² OECD 2015: 30.

⁹³ Information provided by Synergy Global Consulting, December 2015.

⁹⁴ Testimonies collected by iTSCI from representatives of state security forces in Walikale territory, November 2015.

active anymore. Rumours also suggested that some miners would allegedly be in possession of weapons and could possibly join the NDC Sheka if the situation further deteriorates. There were reportedly also some threats by Sheka to attack Alphamin facilities in December 2015. However, no attack has taken place.⁹⁵

On **12 August 2015**, Ntoto, a village located 150 km southwest of Masisi town, south of the Walikale-Masisi route, saw clashes opposing Mai-Mai Kifuafua and NDC Sheka, during which five people were killed and several houses were burnt down, and causing the internal displacement of around 20,000 people.

Please note that there is no US State Department map for 2015 on mineral exploitation by armed groups and other entities.

Type of violations February 2012 – March 2015

At the mine

- Several acts which may be constitutive of human rights violations committed by armed groups at the end August 2013 (including looting); there is no evidence of minerals tampered by these cases.

On the transport route

- Payments made on the transport road to state security services, as agreed by all stakeholders and possibly to customary authorities.
- According to some sources, negociants would pay 20 USD per tonne of minerals to public security services, but the negociants themselves denied this to the iTSCi team in November 2015. The information is therefore not confirmed.
- Reports of attacks by unidentified bandits on the Bisie-Njingala path (between April and June 2014).
- Reports from Global witness and The Enough Project, as well as the UN Group of Expert confirm the demilitarisation of the site, while affirming that some payments are still made to FARDC along the route between Bisie to Njingala.⁹⁶ This was confirmed by iTSCi own research carried out on November 2015. Indeed, the following payments, which were reportedly agreed by all stakeholders, were made by everyone travelling from Njingala to Bisie:
 - In Ndjingala, 500 FC are perceived from each and everyone crossing the border, and a forfeit is perceived also on the goods transported. At this barrier, the following security services are present: DGM, ANR (intelligence) Representative of the territory as well at FARDC 84th Sector.
 - At Misheba, FARDC barrier, 500 FC are perceived at the entrance and exit ;
 - At Mafilifili, FARDC barrier, 500 FC are also perceived at the entrance and exit. A representative of the territory is also present ;
 - Bisie, FARDC barrier, FARDC perceive 200 FC per person, and the customary authorities 500 FC per person and a forfeit for the goods.

⁹⁵ For more information, see the Independent Governance Assessment performed by Synergy Global Consulting.

⁹⁶ Enough Project 2014: 8 and footnote 7. Global Witness 2012: 14-15. UN GoE: The Group has obtained documents and testimonies from government mining officials in Walikale claiming that out of every 2,000 Congolese Francs taxed on each 50 kilogram sack of cassiterite mined, 1,000 Francs are given to security officials, and 30 to 40 per cent of that sum goes to FARDC (annex 67).

6. ASSESSMENT OF INFORMATION FROM AUTHORITIES & OTHER STAKEHOLDERS

Information provided by SAESSCAM, Divimines, the administrative authorities in Bisie, public security forces, cooperatives and companies, as well as third-party reports from the UN and international NGOs highlights various alleged security incidents for the period 2011 to present and these are summarised below. There is no evidence of any regular control or taxation from the mine area during this time period. There are however allegations of some instances of human rights abuses or violations committed by the police. These cases allegedly did not involve any minerals.

Date	INFORMATION ON INCIDENTS	SOURCE
2 Aug 2009	NDC elements of the Maï-Maï Sheka arrived at Bisie together with FDLR; they looted the FARDC base there and stole weapons as well as goods and money from the population. They killed two PMH soldiers, including Commander Mbula and his bodyguard Mr Burongu, 11 FARDC soldiers from the 212 th regiment, and 11 civilians. On 3 August, 9am, the rebels had already left Bisie and returned to their base, on the other side of the OSSO River.	Stakeholder interviews
13 Aug 2009	Massacre of up to 30 people at Bisie perpetrated by FDLR fighters working in conjunction with a Maï Maï leader, Sheka Ntabo Ntaberi, who was previously connected to three companies interested in exploiting the Bisie mine.	UN GoE
30 Jul – 2 Aug 2010	Maï-Maï Sheka and the FDLR allegedly attacked 13 villages in Walikale, in which 387 rapes were reported	GW
28 Apr 2011	NDC elements of the Maï-Maï Sheka arrived at Bisie site together with FDLR to check if FARDC are still present at the site. No clashes were reported. There are reportedly no PNC or PMH forces at that point.	Stakeholder interviews
22 May 2011	NDC elements of the Maï-Maï Sheka arrived at Bisie with FDLR to collect 600 \$ from the Head of the administrative authorities in Bisie; which represents the monthly taxes collected by Sheka. Sheka had imposed this measure to the local authorities, ensuring them that in return his armed group would not permanently stay in Bisie and commit any abuses to the local population.	Stakeholder interviews
27 May 2011	Twelve NDC elements of the Maï-Maï Sheka and five FDLR rebels intended to ambush Canadian journalists between Njingala and Bisie. The journalists were carrying out a report in Bisie. The attack could be prevented, as the journalists used another path/road from Biruwe to go to Bisie.	Stakeholder interviews
9 Jun 2011	NDC elements of the Maï-Maï Sheka entered Bisie site around 2am and stole an amount of money estimated to more than 7,000 \$ from three negociants; while shooting several times in the air. The negociants had intended to purchase minerals from miners.	Stakeholder interviews
10 Jun 2011	Two « colonels » from NDC Sheka , known as Kwabo and Amani and in charge of administration and logistics of the rebel group, arrived at Bisie together with 30 rebels. They collected 180,000 FC (~190 \$) from the Head of the administrative authorities before leaving the site. There were no reports of clashes.	Stakeholder interviews

7 Aug 2011	<p>NDC elements (Nduma Defense of Congo) of the Mai Mai Sheka were present in Bisie for a period of eight months. Their objective was to claim on the public space. They were responsible for looting goods and for hassles.</p> <p>Sheka declared that he was cancelling all State taxes except those on merchandise entering the mine, and demanded that the standard 10 per cent tax be channelled to customary leaders. One individual testified to having been personally tortured by Sheka for more than three hours for failing to comply with those orders. He then installed a one-off tax of \$50 per restaurant, and another of 20,000 Congolese francs per mineral trader or digger.</p>	UN GoE
24 Dec 2011	Conflict between two artisanal miners at Chantier 45 pit. One of the two miners was killed after being tortured by NDC elements , as he had first stabbed the other miner.	Third-party reports
17 Mar 2012	Attack by road bandit known as “Chebutira” on the Ndjingala-Bisie road, at approximately 3 hours’ walk from Njingala. Several goods were looted and people were raped.	Third-party reports
7 Jul 2012	Death of an artisanal miner at Chantier 45 pit due to a landslide.	Third-party reports
3 Sept 2012	Clashes at Angoa site, Utunda <i>groupement</i> , between NDC Sheka and FARDC, resulting in one civilian killed and another injured.	Stakeholder interviews
24 Dec 2012	FDLR reportedly looted Angoa site, Utunda <i>groupement</i> , taking with them goods and kidnapping 15 people. FDLR released them once they returned to the forest.	Stakeholder interviews
End 2012	A man was tortured to death by Sheka because he did not show up to carry out community works (“Salongo”) The exact date of the incident and the name of the victim are unknown.	Third-party reports
June 2013	Alleged incursion of Mai Mai Simba rebels in Manoiré. No information on consequences.	Provincial Minister of Mines Evaluation mission report
30-31 Aug 2013	Fifty Mai Mai Simba elements arrived at Bisie, aiming to settle their accounts with the Nyanga community (ethnic conflict). Three people were seriously injured; several goods were looted. PMH commanders Mr Bihango Dunia and Mr Kambale, belonging to the Nyanga ethnic group and deployed in Bisie, as well as all PNC and PMH agents (some of whom also belonged to the Nyanga ethnic group) left to Walikale town. ⁹⁷	Stakeholder interviews
9 Nov 2013	Attack on Alphamin camp by cooperatives and villagers. No information on consequences or impacts. No reports of minerals involved or tampered during this attack.	Stakeholder interviews

⁹⁷ There is currently no precise information on how long the PNC and PMH agents left the site and when they returned.

9 Mar 2014	Attack by unidentified bandits at Muchele gold site. They reportedly stole goods from ten women.	Stakeholder interviews
3 Apr 2014	Presence of NDC Sheka rebels at the gold mine sites of Muchele, south of Bisie.	Provincial Minister of Mines Evaluation mission report
14 Apr 2014	Clash between FARDC and NDC Sheka at Kabombo site, located in Utunda groupement, north of Bisie.	Stakeholder interviews
Apr-Jun 2014	Several cases of attacks by unidentified bandits on the Bisie-Njingala path were reported, during which goods were allegedly looted.	Stakeholder interviews
15 Mar 2014	Six NDC Sheka allegedly contacted traditional authorities at Muchele site; they asked the traditional authorities to inform FARDC that the latter should leave Bisie site and the surroundings.	Stakeholder interviews
End of March 2014	Three cases of road bandits between Maijiwemajiwe camp and 'chez pasteur' also called Hewabora, located at 4 hours walking distance from Bisie. Goods of people passing this road were stolen.	Provincial Minister of Mines Evaluation mission report
7 Jul 2014	The civil society visited the Alphamin facilities, causing protests by artisanal miners (some of whom may be against Alphamin and the starting of industrial exploitation at the site).	Stakeholder interviews
14 Jul 2014	NDC elements were reportedly seen in Angoa, a village located 3 hours' walk northwest from Bisie. They aimed at strengthening their position in the village.	Stakeholder interviews
15 Jul 2014	Two NDC elements of the Maï Maï Sheka were reportedly seen in Bisie; they allegedly wanted to make an assessment of the situation there.	Stakeholder interviews
16 Jul 2014	Attack by NDC Sheka in Bisie/Mpama. They targeted the Alphamin facilities, destroying several machines and drill cores. The camp was evacuated. One FARDC was killed and three FARDC were injured.	Stakeholder interviews and third-party reports
15-16 Aug 2014	Clashes between NDC Sheka and dissident NDC group led by Guidon were reported at the mine sites of Angoa and Kabombo	Stakeholder interviews
Dec 2014	Clashes between Police and artisanal miners in Bisie, during which one girl was reportedly raped by a police officer. Credible state security provided this information, but other sources question its accuracy. ⁹⁸	Stakeholder

⁹⁸ No information on which state security forces were involved in this incident could be found.

		interviews
Jan 2015	T2 FARDC Captain Ndongala based in Biruwe tortured a man who had a dispute with his wife. The man was torture by putting string around his penis for hours, because he was not able to pay a 100 USD fine.	Stakeholder interviews
6 Mar 2015	Policemen ⁹⁹ securing Alphamin premises entered the mine sites worked by artisanal miners by firing in the air and whipping people on their way. Some miners who hid in the mine pits were taken and allegedly tortured for four days, before being released.	Stakeholder interviews
6 Mar 2015	Conflict between miners, PMH and Alphamin. PMH agents reacted to the invasion of Camp 45' by artisanal miners and chased them away as per the Provincial Minister's order that artisanal mining should not continue on site. The PMH reportedly fired in the air because miners had weapons on-site (including an AK-47 and two Uzis) and those miners had first started to shoot on policemen, reportedly using women as human shields. While other versions of the events exist ¹⁰⁰ , the official investigation concluded the above with two miners then arrested. There are however no reports of minerals involved or tampered during these events.	Stakeholder interviews
12 Aug 2015	Clashes opposing Mai-Mai Kifuafua and NDC Sheka in Ntoto, a village located 150 km southwest of Masisi town, south of the Walikale-Masisi route. Five people were killed and several houses were burnt down. It caused the internal displacement of around 20,000 people.	Stakeholder interviews

⁹⁹ No information on which state security forces were involved in this incident could be found.

¹⁰⁰ According to stakeholder interviews carried out in November 2015, 26 houses were burned down, 36 people were injured, including five seriously, and approximately 106 tonnes of cassiterite were looted. These allegations were not confirmed by any evidences.

7. SUMMARY OF INFORMATION PUBLISHED BY ALPHAMIN

Alphamin is listed on the TSX Venture Exchange (Toronto). The TSX disclosure rules require that the company keeps shareholders informed of all pertinent events, which include ongoing progress at Bisie and any security setbacks experienced. Relevant information has been extracted into the table below. Full details are at; <http://alphaminresources.com/category/market-releases/>. In summary;

- MPC/Alphamin introduced force majeure on the mining area in 2009 due to the security situation and presence of rogue FARDC agents and armed groups.
- Force majeure was lifted in February 2012 as security was significantly improved by that time and the company could access the site.
- The company commenced on-site drilling in second half of 2012.
- Reported rebel movements in ~Oct 2013 align with those reported by the government in Table 3 for 30 Aug 2013. This lasted a short time. There is no evidence of control of the mine by armed groups.
- A dispute between local community (Mai Mai), miners and the company was reported on 21 July 2014. This aligns with those reported by the government in Table 3 for 16 July 2014. This lasted a short time. There is no evidence of control of the mine by armed groups.
- No other insecurity is reported in the area over the period. Other visits were made by mine validation teams as shown below.
- The company was granted a mining licence in February 2015, and continues to develop the foundation to provide funding to community projects.

Date	INFORMATION ON INCIDENTS
18 Aug 2011	Alphamin Closes Acquisition of a 70% interest in the Bisie Tin Project in the Democratic Republic of the Congo and Concurement \$5 Million; MPC was successful in imposing a force majeure on the Property in 2009 , which the Company is in the process of lifting.
30 Jan 2012	Update on Bisie Tin Project; Tin was first discovered at Bisie in 2004 and was mined illegally until recent times. The deposit is unique with grades of 50-95% SnO ₂ (tin oxide – cassiterite) which attracted a large informal mining and support community. Official recorded production figures for Bisie for 2009 were 6,840 tons of tin concentrate although 10,000 tons of concentrate are more likely due to under declaration to avoid high taxes imposed by the Government of DRC. The Government imposed a moratorium on small scale tin mining in 2010 which saw a mass movement of people off the property thereby creating a favourable environment for the Company to commence with detailed exploration programs at Bisie.
29 Feb 2012	Update on Bisie TIN Project, Democratic Republic of Congo; Upon request, MPC SPRL was notified of the lifting of the Force Majeure on 13th February by the Congolese <i>Cadastre Minier</i> ; no comment on security
22 Jun 2012	Alphamin Receives All Civil Aviation Permits and Commences Work on the Bisie TIN Project, North Kivu Province, DRC; no comment on security
9 Jul 2012	Drilling Commences on the Bisie Tin Project, North Kivu Province, DRC; no comment on security
17 Sep 2012	Alphamin intersects high grade Tin, Silver, Zinc and Lead with Diamond Drilling at its Bisie TIN Project, Democratic Republic of the Congo; no comment on security
20 Nov 2012	Further Significant Drill Results from Alphamin’s Bisie Tin Project, Democratic Republic of the Congo; no comment on security

18 Dec 2012	Update on Bisie Tin Project, DRC; no comment on security
23 Jan 2013	Stage 1 Drilling Completed on Bisie Tin Project, DRC; no comment on security
2 Apr 2013	Bisie Project Update; no comment on security
10 Jun 2013	Alphamin Intersects Strong Visual Tin Mineralisation at its Bisie Tin Project, Democratic Republic of the Congo; Despite recent tensions in Goma operations have continued unhindered while the Company continues to receive strong local and Government support.
15 Jul 2013	Exceptional Drill Results from Alphamin's Bisie Tin Project, Democratic Republic of the Congo; no comment on security
10 Sep 2013	Further Outstanding Drill Results from Alphamin's Bisie Tin Project, Democratic Republic of the Congo; no comment on security
26 Nov 2013	Alphamin Announces an Initial Inferred Mineral Resource for the Gecomines Prospect, Bisie Tin Project, Democratic Republic of the Congo; The Company has experienced delays in exploration and drilling since August 2013 when all staff were evacuated due to hostile rebel activities in the immediate surrounds. The Company field camp was raided on 9 November by a group of villagers who caused damage to company equipment and assets. The Company will assess the security situation on site and work will only resume once calm has been restored to the area and staff can return to the project site safely.
25 Feb 2014	Alphamin Commences Deep Drilling on its 100% owned Bisie Tin Project, DRC; no comment on security
28 Apr 2014	ACTIVITY UPDATE ON ALPHAMIN'S 100% OWNED BISIE TIN PROJECT, DRC; The Company has successfully conducted all work programmes without interruption since commencement in February 2014 although reports of limited rebel activity in the vicinity were received. Two evaluation missions were carried out under instruction of the Ministry of Mines with the support of MONUSCO to assess the current status of artisanal workings at Bisie and to assess whether Bisie qualified for validation and conflict free status for artisanal mining. Based on the findings of these missions, the Ministry will now make a decision on further validation and the future of artisanal mining at Bisie.
21 Jul 2014	Suspension of Drilling Activities as a Result of a Security Incident at Mpana North and Mine Camp; Alphamin Resources Corp. has suspended all exploration activities and has evacuated site due to a security incident on its wholly owned Bisie Tin Prospect
22 Jul 2014	<p>Bisie Project Update and Alphamin Appoints Chairman to the Board; The Company continues to conduct work programmes on the project with minimal interruption since commencement in February 2014. Reports have been received that the National DRC Army (FARDC) together with MONUSCO have commenced an operation to reduce rebel activity in the region which will further stabilize the area making it more conducive to foreign investment.</p> <p>The Ministry of Mines initiated an evaluation of prospective artisanal mining sites for Conflict Free Validation in North Kivu raised expectations that Bisie would be included in the list of sites that would be considered for Conflict Free Validation. The evaluation team disproved Bisie as a potential Validation site for artisanal mining as a consequence of the depletion of all shallow ore at depths above 35m. The resultant deep artisanal tunnels are extremely hazardous to those working in them. Whilst it is the Company's view that the Validation of the Bisie Project cannot legally occur, continued efforts are being made to get the necessary support from the authorities in the DRC. As a result of the Validation matter being unresolved, the Bisie Project has seen an increase in the number of artisanal miners on site. Whilst to date this has not caused any issues to the current operations or drilling activities, this matter does need to be resolved if a commercial mine is to be developed at Bisie.</p>

The Company is in the process of establishing a Foundation encompassing the local communities, which will collectively facilitate the implementation of a number of social and community upliftment and development programmes. The Company has contracted Coastal and Environmental Services (CES) to conduct a detailed socio-economic baseline study. CES will identify suitable projects which together with the Company and the Foundation, will be earmarked for implementation during the study or once the project development commences.

27 Jul 2014

ALPHAMIN RECEIVES STRONG SUPPORT FROM THE GOVERNMENT OF THE DEMOCRATIC REPUBLIC OF CONGO TO DEVELOP ITS BISIE TIN PROSPECT; Alphamin Resources Corp. is pleased to announce that the Government of Democratic Republic of Congo ("DRC") has reaffirmed its commitment to fully support Alphamin as it progresses to develop the first large scale mining operation in the North Kivu Province on its Bisie Tin Prospect in the east central DRC. Construction of the mine at Mpama North is scheduled to commence in 2016. As announced July 21st, 2014, Alphamin's management team held meetings with the Regional Minister of Mines and the Office of the Prime Minister in Kinshasa, the capital city of DRC. Meetings were also held at the United Nations Organization Stabilization Mission in the Congo ("MONUSCO"), the American Embassy and USAID. **All Senior Government Officials and MONUSCO have confirmed their support is the requirement for a secure, stable environment for Alphamin to continue its operations free from further interference from negative elements operating in the area.** Key issues to be addressed by the DRC Government will be to inform affected communities that Alphamin through its wholly owned subsidiary, Mining and Processing Congo SPRL ("MPC") is the full legal title holder of Research Permit PR 5266 and that results of the evaluation mission have indicated that no validation of artisanal mining will take place within the limits of the permit unless agreed to by Alphamin. No dedicated artisanal mining zone exists within the boundaries of the permit. Alphamin further received assurance that the Ministry supports Alphamin's application to convert a portion of PR 5266 to a Mining Permit, following the DRC Mining Code procedures. The Ministry would further assist in expediting this application process, indicating their support of a large scale mining operation at Bisie.

Alphamin has been informed that the DRC National Army ("FARDC") and MONUSCO have instituted actions to neutralize rebel groups in the area. The success of these operations will dramatically improve the security situation in the Walikale area and location of the Bisie project.

Alphamin implores all parties involved in the resolving of tenure and occupation of the Bisie area to act with maximum restraint and place the human rights of all as of paramount importance. Alphamin in turn recognizes that the success of the project relies entirely on the full support of local communities. Alphamin has therefore commenced a socio-economic community development programme, which will improve the general living conditions of the population around Bisie and the greater Walikale area. Alphamin is in process of incorporating a Community Trust, which will be funded by 4% of the direct project expenditure excluding DRC taxes. Alphamin has further engaged Coastal Environmental Services ("CES") to conduct a baseline study in which all affected communities and potential development projects will be identified for immediate action.

22 Sep 2014

ALPHAMIN RECOMMENCES DRILLING ON ITS 100% OWNED BISIE TIN PROJECT, DRC; Alphamin Resources Corp. is pleased to announce that following the security incident which took place on 16 July 2014, drilling has recommenced at the Mpama South target on its wholly owned Bisie Tin Prospect (Bisie Project) in east central Democratic Republic of Congo (DRC). The Company has received resounding support at all Government and Ministerial levels as well as United Nations Mission in the DRC (MONUSCO) and is confident that it will continue to work uninterrupted until the eventual development of the mine at Bisie.

The Company will fast track community development and assistance programmes at Bisie and the greater Walikale area which will further demonstrate the company's commitment to the local community through which good relations can be fostered for ongoing support of the project. This is in line with recent successful visits to Goma, Walikale, Bisie and Osokari area with community stake holders.

27 Oct 2014

BISIE PROJECT UPDATE; Subsequent to the attack and then destruction of the camp and equipment at Bisie the **Governor of North Kivu issued a Provincial Order No-1/215/CAB/GP-NK/2014 suspending all artisanal activities and issued instructions to the artisanal miners to vacate the area.** The Government together with the United Nations body called **JMAC/OIM (Joint Mission Analysis Cell of the International Organization for Migration) supported by USAID and other international organizations validated 7 new official artisanal mining sites.** It is anticipated that many of the artisanal miners at Bisie will move to these validated sites. Since the Governor's order, the number of artisanal miners at Bisie has been decreasing, though the situation remains tense.

The Company continues to conduct work programmes on the project with minimal interruption since recommencement. The efforts of the National DRC Army (FARDC) together with MONUSCO have reduced rebel activity in the region, which will further continue to stabilize the area, making it more conducive to foreign investment.

The company is in the process of open dialog for incorporating the LOWA FOUNDATION, where it is planned to allocate 4% of exploration expenditure towards the foundation for local social development initiatives. The Company CEO, Mr Bruce Curling is interacting with key stakeholders at a local and national level with a positive outcome expected shortly. The Company has improved the teaching and learning ability of a school in the Logu area by supplying the school with teaching aids and stationary for all children. The road from Logu to Bisie has been designed to maximize the use of labour. The road is currently being cleared by hand and is expected to be completed late next year.

4 Feb 2015

BISIE PROJECT UPDATE; Alphamin has been in regular contact with key representatives of the Government of the DRC with whom a good working relationship exists. They all expressed their support to the project and to continued support in stabilizing the area of Bisie and Walikale. The local population representatives and the company have been meeting on a regular basis to develop a good working relationship.

The DRC Government and MONUSCO (United Nations) have embarked on a program to validate alternate sites in the region where the artisanal miners can work; once complete these sites will conform to conflict free requirements. Bisie has been excluded from this validation zone, confirming Alphamin's tenure of the property. The local Government of North Kivu, with the assistance of international organizations, is currently finalizing the validation process for legal artisanal sites. The process will be complete in Q1 of 2015. Since the Provincial decree to suspend all artisanal miner's activity following the attack on the camp at Bisie last year, **the number of artisanal miners at Bisie has continued to decrease** as they seek alternative sites.

The joint operations between the National Army (FARDC) and MONUSCO (United Nations) have been making strides to stabilizing the Walikale area. There has not been any rebel activity in the Walikale area since the attack at Bisie in July 2014.

9 Feb 2015

GRANTING OF MINING LICENSE; Alphamin Resources Corp. is pleased to announce **receipt of Mining License PE 13155** which covers a portion of its wholly owned PR5266 and includes the Bisie Tin Prospect in East Democratic Republic of Congo (DRC).

26 Mar 2015

ALPHAMIN ANNOUNCES A MINERAL RESOURCE UPGRADE AT ITS WHOLLY OWNED MPAMA NORTH PROSPECT, BISIE TIN PROJECT, DEMOCRATIC REPUBLIC OF THE CONGO;

	no comment on security
15 Jul 2015	ALPHAMIN REPORTS ENCOURAGING DRILL RESULTS FROM ITS NEW DISCOVERY AT ITS MPAMA NORTH PROSPECT, BISIE TIN PROJECT, DEMOCRATIC REPUBLIC OF THE CONGO; no comment on security

8. ASSESSMENT OF CONFLICT RELATED RISKS BY MONTH

In the light of the information described in this report, the Table below provides a month-by-month assessment of conflicted related risks from the beginning of residual stocks until September 2015. Risk assessment for the period October 2015 – December 2015, during which the residual stocks were tagged at Bisie, will be provided in the Independent Governance Assessment performed by Synergy Global Consulting.

The Table differentiates between risks at the mine site and the risks along the transport route; in both cases, the Table summarise the different actors present at the mine site or along the transport route (public security forces, armed groups etc.). It further indicates if human rights violations or security incidents have been reported, and if so, whether minerals were involved or impacted by such instances. The last column on the right provides a risk assessment by differentiating between low, middle, and high risk. When **low risk** is mentioned, it means that, based on the information collected and provided in this report, there is little concern of illegal payments or other security or human rights violations for stocks produced at the corresponding month.

Information collected from processors/exporters agrees with the information presented in this report and with the following risk assessment.

Month/Year	Risks – at the mine site ¹⁰¹	Risks – along the transport route ¹⁰²	Assessment
January 2011	Presence of public security forces	Reports of forced recruitment of miners by FARDC	High risk at the mine: illegal payments made to, and human rights violation committed by FARDC; High risks of forced labour on the transport route
February 2011	Presence of public security forces	Reports of forced recruitment of miners by FARDC	High risk at the mine: illegal payments made to, and human rights violation committed by FARDC High risks of forced labour on the transport route
March 2011	Demilitarisation of Bisie; Presence of public security forces – no security and human rights related incident	No information	Medium risk at the mine: possibility of ongoing illegal payments made to FARDC during the demilitarisation process
April 2011	Presence of public security forces and of NDC Sheka with FDLR; No human rights related	No information	High risk at the mine: extortion of miners

¹⁰¹ Risks applicable for stocks in Bisie, Ndjingala and Goma.

¹⁰² Risks applicable for stocks in Ndjingala and Goma.

	incident		
May 2011	Presence of public security forces – no human rights related incident; Gradual control of mine site by NDC Sheka	No information	Medium to high risk at the mine: extortion of miners
June 2011	Presence of public security forces – no human rights related incident; Gradual control of mine site by NDC Sheka	No information	Medium to high risk at the mine: extortion of miners by armed group
July 2011	Presence of public security forces – no human rights related incident; Gradual control of mine site by NDC Sheka	No information	Medium to high risk at the mine: extortion of miners by armed group
August 2011	NDC present at Bisie site; extortion of miners	No information	High risk at the mine: extortion of miners by armed group
September 2011	NDC present at Bisie site; extortion of miners	No information	High risk at the mine: extortion of miners by armed group
November 2011	NDC present at Bisie site; extortion of miners	No information	High risk at the mine: extortion of miners by armed group
December 2011	NDC present at Bisie site; extortion of miners	No information	High risk at the mine: extortion of miners by armed group
January 2012	NDC present at Bisie site	No information	High risk at the mine: extortion of miners by armed group
February 2012	NDC out of Bisie; FARDC presence	No report of armed groups or illegal activities by state security forces	Low risk at the mine Low risk along the transport route
March 2012	Presence of public security forces – no security and human rights related incident	One reported attack by bandits on Bisie-Ndjingala path Global Witness report illegal taxation from FARDC at barriers on the Bisie-Ndjingala road	Low risk at the mine Medium risk of payments to state security forces on the transport route
April 2012	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
May 2012	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
June 2012	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
July 2012	Presence of public security forces - No security and human rights related	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the

	incident		transport route
August 2012	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
September 2012	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
October 2012	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
November 2012	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
December 2012	Presence of public security forces - No security related incident; Report of the worst forms of child labour	FARDC checkpoint between Bisie and Ndjingala to secure the path	Medium risk at the mine Medium risk of payments to state security forces on the transport route
January 2013	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
February 2013	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
March 2013	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
April 2013	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
May 2013	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
June 2013	Alleged incursion of Mai-Mai Simba in Bisie, according to interviews and third-party reports	FARDC checkpoint between Bisie and Ndjingala to secure the path	Medium risk at the mine: No report or evidence on illegal tax collection or on control of the mine. No report on human rights related incidents. Conflict probably related to ethnic problems rather than control over mineral resources Medium risk of payments to state security forces on the transport route

July 2013	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
August 2013	Attack by Maï Maï Simba in Bisie against Nyanga ethnic group; report on human rights violations	FARDC checkpoint between Bisie and Ndjingala to secure the path	Medium risk at the mine: No report or evidence on illegal tax collection or on control of the mine. No report of minerals being affected. Conflict probably related to ethnic problems rather than control over mineral resources Medium risk of payments to state security forces on the transport route
September 2013	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
October 2013	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
November 2013	Presence of public security forces; report of one attack by cooperatives/local population No human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Medium risk at the mine Medium risk of payments to state security forces on the transport route
December 2013	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
January 2014	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
February 2014	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
March 2014	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path Report of presence of unidentified bandits at a gold site south of Bisie	Low risk at the mine Medium risk of payments to state security forces on the transport route
April 2014	Presence of public security forces - No security and human rights related incident	Report on presence of NDC Sheka at a gold site south of Bisie Report of attacks by unidentified bandits on the	Low risk at the mine Medium to high risk of payments to state security forces on the transport route

		Bisie-Njingala path FARDC checkpoint between Bisie and Ndjingala to secure the path	
May 2014	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path Report of attacks by unidentified bandits on the Bisie-Njingala path	Low risk at the mine Medium to high risk of payments to state security forces on the transport route
June 2014	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path Report of attacks by unidentified bandits on the Bisie-Njingala path	Low risk at the mine Medium to high risk of payments to state security forces or to bandits on the transport route
July 2014	Conflict between local community (including Maï Maï) and Alphamin; attack on Alphamin facilities	FARDC checkpoint between Bisie and Ndjingala to secure the path	Medium risk at the mine: No evidence of control of the mine by armed groups or on illegal collection of taxes; No report on human rights violation. Medium risk of payments to state security forces on the transport route
August 2014	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
September 2014	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
October 2014	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
November 2014	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
December 2014	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
January 2015	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
February 2015	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
March 2015	Tension between some artisanal miners and Alphamin at Bisie.	FARDC checkpoint between Bisie and Ndjingala to secure the path	Medium risk at the mine: Exchange of fire/clashes between police and miners.

			Medium risk of payments to state security forces on the transport route
April 2015	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
May 2015	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
June 2015	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
July 2015	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
August 2015	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route
September 2015	Presence of public security forces - No security and human rights related incident	FARDC checkpoint between Bisie and Ndjingala to secure the path	Low risk at the mine Medium risk of payments to state security forces on the transport route

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