



ITRI Tin Supply Chain Initiative (iTSCi)
Independent assessment of the minerals
evacuation process from Bisié, Walikale
Territory, North Kivu Province, DRC



December 2015

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Client:	ITRI, on behalf of the iTSCi programme
Project:	iTSCi Programme
Project No:	1332
Report Title:	Independent assessment of the minerals evacuation process in Bisié, North Kivu.
Version:	Version 1.0
Date Issued:	12 June 2016
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Acronyms

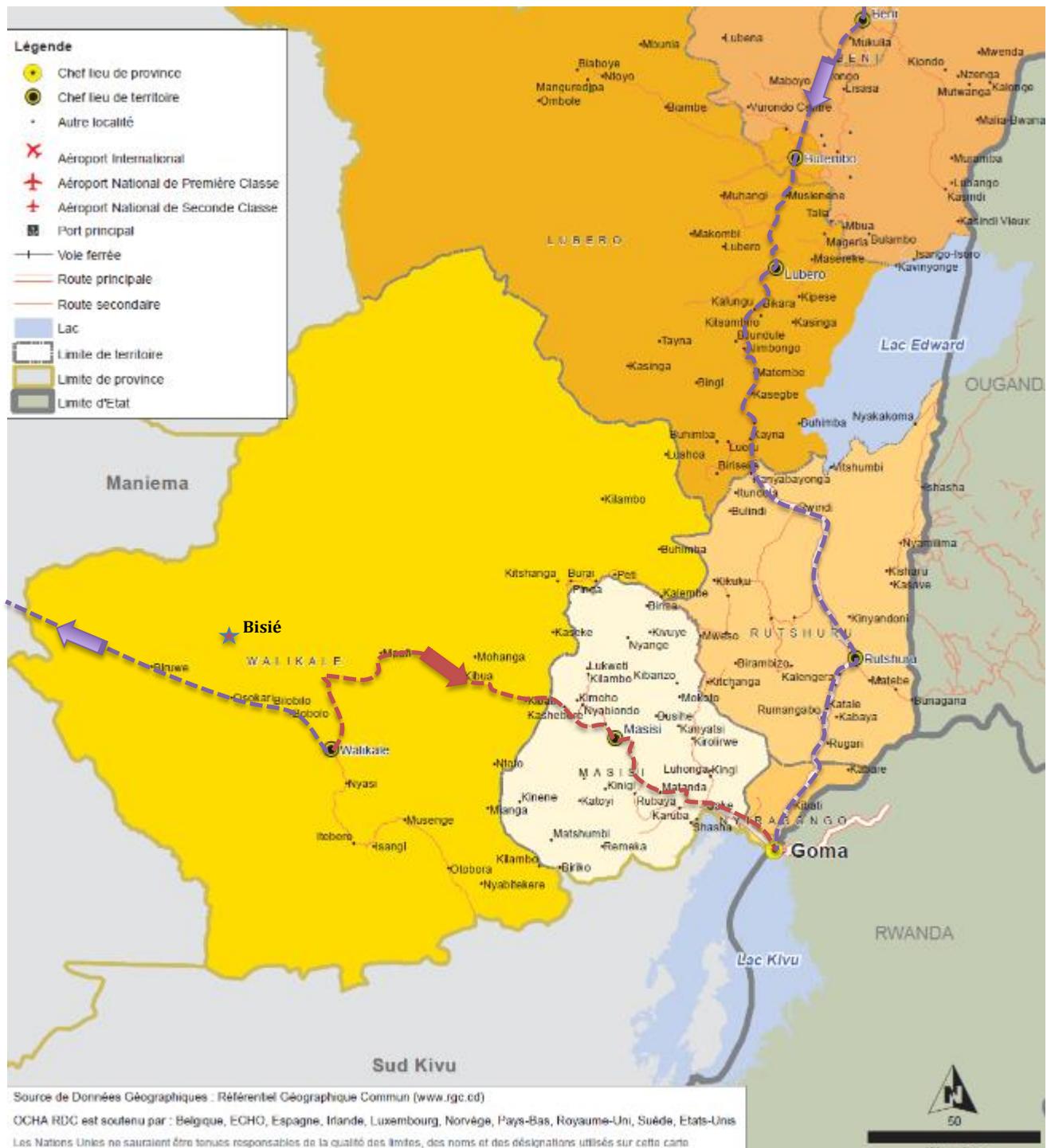
Acronyms	
ANEMNKI	Association des Négociants de Minéraux du Nord-Kivu
ANR	Agence Nationale de Renseignements
ATM	Autorisation de transport de Minerais
BGR	Bundesanstalt für Geowissenschaften und Rohstoffe (Federal Institute for Geosciences and Natural Resources)
CAMI	Cadastre Minier
CEEC	Centre d'Expertise, d'Evaluation et de Certification des substances minérales précieuses et semi-précieuses
CLS	Comités Locaux de Suivi
CPS (or CPP in other iTSCi areas)	Comité Provincial de Suivi
COCABI	Coopérative des Creuseurs Artisanaux de Bisié
COMIMPA	Coopérative Minière de Mpama Bisié
DDG	Due Diligence Guidance of Responsible Supply Chains of Minerals from Conflict-affected and High-risk areas
DGDA	Direction Générale des Douanes et Accises
DGM	Direction Générale des Migrations
DIVIMINES	Division des Mines
DRC	Democratic Republic of Congo
FARDC	Forces Armées de la République Démocratique du Congo
FEC	Fédération des Entreprises du Congo
ICGLR	International Conference on the Great Lakes Region
ITRI Ltd	International tin industry association
iTSCi	ITRI Tin Supply Chain Initiative
JMAC/IOM	Joint Mission Analysis Cell of the International Organization for Migration
MONUSCO	Mission de l'Organisation des Nations Unies pour la Stabilisation en RD Congo
MPC	Mineral Processing Congo
NDC	Nduma Defense of Congo
NGO	Non-Governmental Organisation
PMH	Police des Mines et des Hydrocarbures
PV	Procès-Verbal
OECD	Organisation for Economic Co-operation and Development
OIM	Organisation Internationale pour les Migrations
SAESSCAM	Service d'Assistance et d'Encadrement du Small-Scale Mining
UN	United Nations

Glossary

All terms in *italic* in the text are French terms, which are translated in the below table.

French terms	Translation
<i>Administrateur du Territoire</i>	Territory Administration
<i>Agence Nationale de Renseignements</i>	National Intelligence Agency
<i>Arrêtés ministériaux</i>	Ministerial decree
<i>Association des Négociants de Minerais du Nord-Kivu (ANEMNKI)</i>	North Kivu minerals traders association
<i>Autorisation de transport de Minerais</i>	Mineral transport authorisation
<i>Autorisation spéciale d'évacuation des minerais résiduels de Bisié</i>	Special Bisié mineral evacuation authorisation
<i>Cadastre Minier</i>	Land Register
<i>Carte de creuseurs</i>	Artisanal miners' official licence
<i>Centre de négocie :</i>	Trading centre
<i>Centre d'Expertise, d'Evaluation et de Certification des substances minérales précieuses et semi-précieuses</i>	Minerals expertise and certification centre
<i>Chantier</i>	Pit
<i>Chefs coutumiers</i>	Customary authorities (chiefdom)
<i>Chef d'antenne</i>	Local manager
<i>Certificat d'origine</i>	Certificate of origin
<i>Comité Provincial de Suivi (CPP)</i>	Provincial monitoring committee
<i>Commandant d'Escadron</i>	Squadron Commander
<i>Comités Locaux de Suivi (CLS)</i>	Local monitoring committees
<i>Direction Générale des Douanes et Accises</i>	General customs department
<i>Direction Générale des Migrations</i>	Migration Department
<i>Établissements</i>	Facilities
<i>Fédération des Entreprises du Congo</i>	Federation of Congolese companies
<i>Grande Époque</i>	Great times
<i>Mission de Validation</i>	Validation mission
<i>Moratoires</i>	Moratory
<i>Négociants</i>	Local traders
<i>Organisation Internationale pour les Migrations (OIM)</i>	International Organization for Migration (IOM)
<i>Permis d'Exploitation</i>	Exploitation permit
<i>Police des Mines et des Hydrocarbures</i>	Police of mines and hydrocarbons
<i>Procès-verbal</i>	Official report
<i>Protocole d'Accord</i>	Agreement
<i>Répondants</i>	Representatives

Figure 1. Map of the North-Kivu Province, showing the location of Bisie and minerals evacuation roads from Walikale to Goma (via Masisi in red and via Kisangani-Beni in purple)



Executive summary

Synergy Global Consulting was appointed by ITRI as Secretariat of the iTSCi Programme to carry out an independent evaluation of the minerals evacuation process from Bisié, Walikale Territory, North Kivu, DRC. The scope of the Assessment is to evaluate the circumstances of the minerals evacuation process from the artisanal mining site of Bisié, and to assess it against the Appendix and the Annex II of the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance of Responsible Supply Chains of Minerals from Conflict-affected and High-risk areas (DDG) and the requirements of the OECD outline process. The evaluation team provides the following conclusions:

- The implementation of the stock evacuation, in spite of some discrepancies in the roll-out compared to the initial process outlined by stakeholders and the Congolese Authorities, seemed sufficient to ensure an ongoing control by the authorities over the volumes, as well as the availability of relevant information and the payment of official taxes. It also enables to keep track of the traceability and official payments' records along specified transport routes. Regarding the traceability process, it appeared that small quantities of minerals have been produced in 2011, part of which at a time when Sheka was controlling Bisié. As a mitigation, PACT informed the corresponding processors/exporters that these minerals – if arrived at their facilities – should not be mixed and should be put aside. The evaluation team considers it corresponds to an acceptable mitigation measure in order to avoid stock contamination.
- The stock's clearance process and associated on-the-ground assessment by PACT has so far created enabling conditions for effective due diligence, risk assessment and mitigation by exporters, including by maintaining information on suppliers and the circumstances of mineral extraction, trade and transport. Throughout the process, no incidents of major concern in relation to the militarisation of Bisié site by non-state armed groups was identified. However some security incidents and informal taxation points related to annex II risks were observed on Bisié minerals transportation routes. These incidents have been identified and addressed by PACT teams, such as the illegal taxation on the road to Kisangani, and payments made to FARDC on the path between Bisié and N'jingala which have both been discussed and addressed during CLS meetings (respectively in November 2015 and January 2016). A summary of annex II risks is available in the next section and a full analysis in section II.
- Numerous interviews led the evaluation team to note all stakeholders' desire and expectations of seeing the evacuation process come to a successful conclusion. All stakeholders including the artisanal mining value chain actors and the authorities are benefiting in terms of economic value, as well as opportunity to move to other mining sites (iTSCi sites) with resolution to the issue of frozen cash flow.
- A major factor of delay is the financial bottleneck in the value chain induced by négociants' lack of cash flow and debts towards creuseurs and cooperatives. When the stock clearance was authorised, négociants often could not pay for the whole production they had pre-funded, and they now have to wait for the first shipment to be paid by the exporter. This creates a bottleneck in the value chain and négociants therefore are neither always able to pay the balance to creuseurs for their production, nor the packaging/ transport of the minerals. The bottleneck is worsen by the long transportation time, and the currently low international tin price, which make négociants hardly able to break even.
- Industrial prospects in Bisié area bring opportunities to the Province in terms of development and fiscal benefits, but raises concerns as to current relations with artisanal miners present on-site. Existing tensions in an already unstable territory must be tackled very cautiously by Provincial

authorities, which should take consistent measures (including ensuring appropriate communication) for enabling the industrialisation to take place in a stable area with a social licence to operate.

Summary of OECD Annex II risks

The evaluation team did not find any direct evidence at the time of the evaluation that Bisié artisanal mining sites were affected by the following OECD annex II risks:

- Serious abuses associated with the extraction, transport or trade of minerals; and
- Support to non-state armed groups.

However cases of taxation by public security forces on transportation routes and risks of fraudulent misrepresentation of the origin of minerals were reported. See below a short analysis of the factual circumstances of Bisié artisanal mining sites in relation to key OECD DDG Annex II risks.

Circumstances related to serious abuses associated with the extraction, transport or trade of minerals

Various cases of serious human rights abuses were reported in Bisié artisanal mining sites by several sources¹ for the period before 2012. These reports referred to serious abuses such as forced labor, child labor, inhuman treatment or sexual violence². During their visit between 18 and 20 December 2015, which involved a visit of one of the two mining sites and interviews with representatives of all cooperatives, the evaluation team did not find any direct evidence of serious human rights abuses in Bisié artisanal mining sites. No forms of torture or inhuman treatment and no indications of forced labor were observed. However it is important to note that there are many paths towards forced labor and that not having directly witnessed proven cases does not eliminate existence of risks. The evaluation team did not obtain any evidence of worst forms of child labor on-site, although some of the artisanal miners were young. It is therefore difficult, without an appropriate census of age and type of activity, to assuredly confirm that no youths working on-site were not under 18 years' old.

Circumstances related to the support to non-State Armed Groups in/near mining sites

The evaluation team did not find any evidence of the presence of non-State armed groups in Bisié artisanal mining sites during their visit between 18 and 20 December 2015. However two events in the province have to be mentioned to the extent that they could potentially impact the Bisié area in the future:

- In the night of 26-27 October 2015, an FARDC munitions depot in Walikale town was attacked by unidentified bandits. A FARDC soldier was killed, and weapons including munitions boxes were stolen. According to information gathered in the field, a new armed group was created and could have allegedly received the weapons stolen in the FARDC depots. This group is reportedly composed, among others, of one former Mai-Mai Simba known as Sombo Desiré. Intelligence

¹ Several reports had identified serious human rights abuses in the Bisié area. These include reports from the UN Group of Experts, IPIS and from local and international NGOs. For more details about these reports and related human rights abuses, see the Bisié Security report (PACT) or the third-party review carried out by IPIS. Recently, Kevin Bales also wrote a book including reports of forced labor in the Bisié area: *Blood and Earth, modern slavery, ecocide and the secret to saving the world*; Kevin Bales, 2016. An interview with the author confirmed that visits carried out in the area by the author had been made before 2012.

² By armed groups such as Sheka or by public security forces such as FARDC 85th and 212th brigades.

gathered by the ANR suggested that this new armed group was recruiting and collecting weapons in the forest around Bisié. If correct, this could represent a future risk of illegal taxation, worst forms of abuses and illegal control of nearby artisanal mines although none of these issues have been observed to date.

- In July 2014, Maï-Maï Cheka attacked Alphamin facilities, destroying several machines and drill cores in Bisié. Mai-Mai Cheka are currently operating gold and diamond mines in the Walikale territory, reportedly mainly around the OSSO River, and could therefore represent a future risk for the Bisié area (of illegal taxation, worst forms of abuses and illegal control of nearby artisanal mines). This is especially true since Mai-Mai Sheka reportedly has historical connections to artisanal mining groups and communities in Bisié (especially with the Banyanga, clan Nyanga) and have reportedly regularly threatened to reattack Alphamin facilities³.

Before 2013, artisanal sites in Bisié have been infamous for regular interference of non-state armed groups (see Pact Bisié security report for detailed information).

Circumstances related to the presence of non-State Armed Groups on/near transportation routes

The evaluation team did not find any evidence of the presence of non-State armed groups illegally controlling minerals' transportation routes. In the vicinity of the Walikale-Masisi road (at about 100 km at the north-west of Goma), which is the primary evacuation route for Bisié minerals, clashes between rival factions of Nduma Defence Congo (NDC) Cheka as well as between NDC Cheka and Mai Mai have occurred in 2015. Although no incident on this road has directly affected the minerals trade so far, the poor condition of the road and the time it takes to arrive to Goma (3-4 weeks) means trucks are more vulnerable to attacks or illegal taxation. This led many négociants to use the Kisangani-Beni transport route, a road that is safer and in better condition, but also considerably longer (1500 km). No illegal taxation by non-state armed groups had been observed on minerals relevant to this report.

Circumstances related to the support of public or private security forces

There is a permanent presence of public security forces in Bisié (PMH and FARDC) in order to protect the area from interference of armed groups, including threats to Alphamin facilities. There have been two events in 2015 that contributed to strain the relations between artisanal miners and the authorities and Alphamin but these cannot be directly connected to the extraction, transport or export of minerals artisanally mined in Bisié (see section III). However, two issues related to the support of public security forces have to be mentioned:

- Cases of illegal taxation by the Agence Nationale du Renseignement (ANR) have been reported on the Kisangani-Beni axis (outside of the Walikale territory) which has directly impacted the minerals trade (see section II). iTSCI identified that risk through incident NK/2015/0115 regarding illegal taxes collected by ANR agents in Kisangani. The Walikale CLS sent a letter to the provincial minister of mines and the provincial minister to denounce the abuses. The situation has reportedly improved since (December CLS meeting), but the names of the ANR agents and whether they were punished remain unknown.
- The evaluation team can also confirm that payments are made to FARDC along the route between Bisié to Njingala (4 barriers, see section II for more details), incident NK/2015/0123. The payments, which were agreed by all stakeholders⁴, were made by everyone travelling from

³ Threats of attacks by Cheka on 15/12/15 have been conveyed in Q4 2015, and triangulated by the evaluation team

⁴ See letter from the CLS in Walikale, in annex I.

Njingala to Bisié and aimed to reinforce the security in the area. In December, one of the four barriers was removed by authorities. Local stakeholders committed to ensure, if such informal taxation were to happen again, that a more open and prior communication would happen at the CLS.

The evaluation did not find other evidence of other OECD risks in relation to public or private security forces in Bisié sites or on transportation routes.

Circumstances related to bribery, money laundering, and fraudulent misrepresentation of the origin of minerals

- The risk of Bisié minerals being tagged on iTSCI sites was identified by iTSCI field teams in incidents NK/2015/0043 and NK/2015/0044, when it turned out that the cassiterite delivered to two entities in Goma was red. Red cassiterite is reportedly only found in Bisié although it is not clear if that is a reliable guide. Incidents are still under investigation; no other similar incidents were reported since then. The evaluation team judges that there is a risk of smuggling of minerals from Bisie to iTSCI sites, but that it remains low at the current price of cassiterite since (i) the transport from Bisié to other sites represents a prohibitively high cost, and (ii) the grade of the Bisié cassiterite is quite low.
- Another issue raised during the process relates to small quantities of minerals that seem to have been produced before 2012, and therefore possibly having benefitted armed groups that were present in the area during that period (see section II and section III and BISIE SECURITY REPORT 2010-September 2015 by PACT). An incident report was opened (NK/2016/0046) and PACT, as a mitigation, informed the corresponding processors/exporters that these minerals – if arrived at their facilities – should not be mixed and should be put aside. The evaluation team considers it corresponds to an acceptable mitigation measure in order to avoid stock contamination (see section II).

Key due diligence recommendations to exporters

The evaluation team judges that appropriate mitigation measures have so far been taken by the on-the-ground assessment teams and local stakeholders, as indicated in section II of this report. However it remains exporters' responsibility to ensure that appropriate due diligence actions (both in terms of risk assessment and mitigation) are implemented. The evaluation team recommends therefore to exporters to ensure the following actions are carried out:

- Put in quarantine all minerals potentially related to periods when non-state armed groups were controlling Bisié mining areas, or when serious human rights abuses were committed, following evaluation of information provided to them by the on-the-ground assessment teams. Coordinate with the CLS and cooperate with relevant administrative and political authorities as to which actions must be taken regarding these minerals and publicly report on these;
- Closely follow and participate in CLS meetings in Goma and Walikale and ensure that (i) identified risks have been managed effectively and that appropriate follow up measures are implemented and, (ii) that the two CLS continue to effectively assess potential new risks emerging in the area regarding the evacuated Bisié stocks, so that appropriate mitigation measures can continue to be implemented; and
- Report publicly on due diligence actions that were carried out in relation to Bisié stocks.

Introduction

The mineral rich site of Bisié, in Walikale territory, North Kivu, in the Democratic Republic of Congo (DRC), was allegedly discovered by indigenous people in the early 2000's and became both a significant source of cassiterite artisanal mining, and also a site of interest for industrial mining. The first exploration licence on the area was granted to the company Mineral Processing Congo (MPC) in 2006, followed by an exploitation licence in February 2015. A change in legal identity and name of the company means that industrial activity is being developed under a current *Permis d'Exploitation* issued by the Government and valid for Alphamin Bisié Mining SA⁵ for gold and tin until 2045. The artisanal mining activity, while tolerated and varying to extent over many years, was not validated by the Government, and always remained outside the ITRI Tin Supply Chain Initiative (iTSCI) or any formal system, which has restricted the miner cooperatives from marketing the minerals as 'conflict-free'. Tensions have existed between the formal and informal sector, and the artisanal mine has also been the focus of some control by armed groups (for further details on the above please see BISIE SECURITY REPORT for the period 2010-September 2015 produced by PACT).

As a result of complex circumstances over previous years, local miners and *négociants* have accumulated considerable stocks since the time of the DRC mining suspension in 2011 that they were unable to evacuate from Bisié. There was in October 2015 reportedly about 1,300 tonnes of cassiterite stock in the North Kivu Province that had been produced in the Bisié artisanal mining area over the past three years⁶. The continued presence of stocks suspends miners' activities on Bisié artisanal mining sites – since it freezes cash flow and mineral trading for local value chain actors (particularly for artisanal miners on-site and in-region *négociants*). This situation also hinders the construction of the industrial mine at Bisié by Alphamin as miners do not wish to leave their stocks and therefore the site, as well as the full development by iTSCI of surrounding conflict-free mining areas beneficial to the local communities, and finally also contributes to local tensions in the area.

This situation led to a discussion within the OECD stakeholder group in 2014 and 2015 and resulted in an agreement on a minerals' tagging and evacuation process over a period of 60 days. On 26 June 2015, the DRC National Minister of Mines agreed to the minerals evacuation process outlined by the OECD stakeholder group: in total, after two moratoria decided by the National Minister of Mines, the stock clearance process lasted 80 days, between 13 October 2015 and 31 December 2015.

This report presents the findings of the Independent Field Assessment conducted between 14 and 23 December 2015 in Walikale territory, in the North Kivu province of the DRC (which included visits in Goma, Walikale and Manoiré/Bisié). The scope of the Assessment is to evaluate the circumstances of the minerals evacuation process from the artisanal mining site of Bisié, and to assess it against the Annex II and the Appendix of the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance of Responsible Supply Chains of Minerals from Conflict-affected and High-risk areas (DDG) and the requirements of the OECD outline process.

Throughout the fieldwork, interviews were held with administrative and customary leadership, government representatives, economic operators and civil society representatives. The team also held group meetings with individual *négociants* and met with artisanal miners, people working at the mineral

⁵ Permis d'Exploitation 13155.

⁶ Excluding small quantities produced before, see section II

washing and crushing areas and miners' representatives. In total about 30 interviews were held (see list in annex I).

The report is divided into three sections:

- 1) **Section I** describes the background context leading to the multi-stakeholder agreement and the tagging and evacuation process of the Bisié stock;
- 2) **Section II** assesses the role of the assessment team and oversight by local stakeholders against the Appendix of the OECD Guidance, and provides an analysis of incidents identified throughout the process against the Annex II of the guidance. It also describes stakeholder reactions, and the benefits of the evacuation process;
- 3) **Section III** describes further prospects, including potential risks and opportunities of the Bisié mine industrialisation, and possible security issues in the area.

SECTION I – Background of the multi-stakeholder agreement and description of the tagging and evacuation process

A. Multi-stakeholder agreement leading to the stock clearance process

The stock clearance process was initially discussed within the OECD stakeholder group in a side meeting in Kinshasa in November 2014. The discussion of the OECD group led to a suggested process for the stock evacuation which would align with the Appendix of the *OECD Due Diligence Guidance of Responsible Supply Chains of Minerals from Conflict-affected and High-risk areas*. Minutes of the meeting⁷ were signed at the 8th OECD-UN-ICGLR meeting in Paris by all relevant stakeholders (OECD, Government of the DRC, Provincial Minister, US State Department, FEC, ITRI, T.I.C., PACT, BGR, buyers). The stock clearance process was further discussed in an inclusive way and involved all relevant DRC authorities. The process was finally approved by the National Minister of Mines in a letter signed on 3 July 2015⁸ with added conditions:

- The mineral owners, the exporting processing entities, and the international buyers must be clearly identified and be in compliance with the Ministry of Mines, the tax authorities, and the province;
- The CEEC General Director must go to Goma to supervise the operations;
- The stock will be exported with Certificates of Origin (and not with ICGLR certificates) signed by the CEEC General Director⁹;
- A copy of the minutes of the meeting signed by all stakeholders during the 9th OECD meeting as well as the court orders will need to be attached to all mineral lots.

In April 2015, MPC/Alphamin expressed non-objection to the evacuation process (see letter in Annex B).

As required by national authorities, the first step of the process was to carry out an inventory of the stocks present in Bisié and to identify the various owners of the minerals' stock. Local miners and *négociants*, or more often their representative (*répondant*) had to declare their personal stocks, which were listed by local agents. On 5 June 2015 governmental agencies released preliminary statistics, which stated there were 27,361 bags, or 1,368,050 kg of minerals in Bisié. This inventory was carried out by the local DIVIMINES office in Bisié in May and early June 2015 (and particularly by the *chef d'antenne*, Mr Maurice Mahamba), supported by SAESSCAM, and *Police des Mines* (PMH) agents. The inventory was made available to evaluators in Bisié, and can be found in Annex C: it informs the names of the minerals' owners, number of bags owned, associated weights, and whether or not owners have artisanal mining licences (*carte de creuseurs*), which is typically not the case.

⁷ Minutes of the meeting are available in annex D

⁸ Letter from the National Minister of Mines is available in annex E. It is to be noted that the letter does not explicitly refer to the evacuation of Bisié's stocks, but to stocks present at exporter's warehouses in Goma and others related to frauds. However later authorizations from the National Minister of Mines will correct this and explicit references to Bisié's stocks with mentions of related quantities will be made.

⁹ Bisié artisanal mines not being validated and part of any traceability and due diligence programme, conditions are not met for the issuance of ICGLR certificates. Certificates of origin are issued as per the explanation provided in section I.B

At the end of June 2015, the iTSCI team conducted a verification mission and found a total of 1,351,550 kg of minerals on sites, or 27,031 bags of 50kgs. The discrepancy of 16,700Kgs is due to bags that were counted twice, and was corrected by the local administration (correction visible on the records of the inventory).

On 27 July 2015, the General Director of the *Centre d'Expertise, d'Evaluation et de Certification des substances minérales précieuses et semi-précieuses* (CEEC) held a meeting with all stakeholders, which agreed:

- To proceed with clearance along specified transport routes to specified destinations (Walikale-Goma either via Bukavu, Masisi or Kisangani);
- Stock tags to be affixed at the site;
- Minerals to be moved for a period of two months following the first tag date;
- Artisanal miners must leave the site and go to other iTSCI sites;
- Cooperatives must not 'renew' their mineral stock and in case of non-compliance their licence may be withdrawn;
- *Négociants* must not buy any further untagged minerals, and in case of non-compliance the minerals will be seized by the state;

Following this announcement, on 3 August 2015, the technical mining commission composed of representatives from the various State mining agencies¹⁰, adopted, in a *Procès-verbal* (PV) available in Annex F, the following,:

- Minerals will be packed at the mine into 25 kg bags and tagged with green¹¹ tags;
- The authorities will issue mineral transport attestations (ATM¹²) from mine to trading point, and from trading point to exporter;
- The due fees and taxes will be paid to authorities in Goma with receipts sent by Pact/ITRI to the mine via internet to release minerals;
- Pact/ITRI must order more green tags for the entire stock;
- All stakeholders concerned engage to not tag more minerals than the quantity of minerals declared.

Subsequently, it was determined that due to practical and financial difficulties in transporting a large number of bags, the normal 50kg weight would be adopted (see also in section II). This also meant that no additional tags were required.

¹⁰ Provincial Minister, CEEC, SAESSCAM, DIVIMINES.

¹¹ iTSCI had previously obtained tags intended for use on stocks in Maniema Province which were green rather than the normal white colour in order to make them readily identifiable. Those tags were made available for use for Bisie.

¹² Autorisations de Transport de Minerais

B. Description of the tagging and evacuation process and official authorisations issued by local and national government

The agreement described in the above section aims to maximise control over the volumes, the amount of information available with the mineral, as well as ensuring official tax payments have been made: state agencies must be able throughout the whole duration of the evacuation process to monitor the volumes, and to keep track of the traceability and official payments' records along specified transport routes:

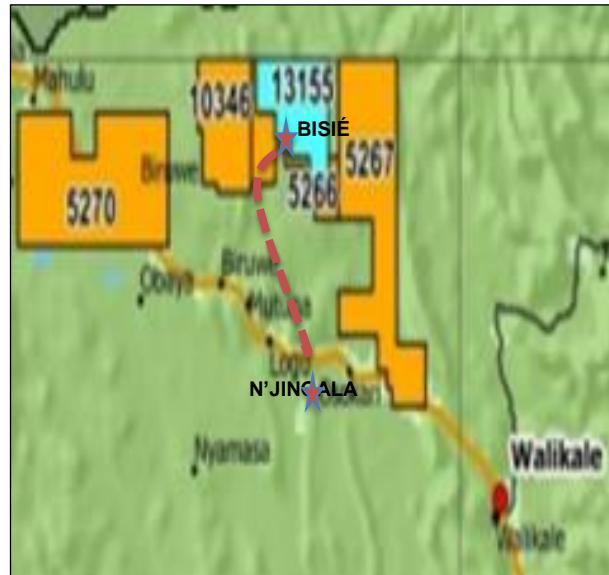
In Manoiré (the village where Bisie mine pits are located), on 11 October 2015 before the tagging process effectively started, DIVIMINES produced for every present minerals' owner (or its *répondant*), an *autorisation spéciale d'évacuation des minerais résiduels de Bisie* (*autorisation spéciale*, available in Annex G).

On 13, October 2015, SAESSCAM agents started weighing and tagging the bags of minerals once the owner (or its *répondant*) had been identified on the inventory and the volume of minerals checked and recorded by DIVIMINES in the *Autorisation spéciale d'évacuation des minerais résiduels de Bisie*. The evaluation team could verify that authorisation forms were compliant with the initial inventory and allow local agents to record the progress of the minerals' evacuation process for every owner throughout the process. Three SAESSCAM agents were present in Bisie throughout the whole process (two taggers and one supervisor). In addition to weighing and tagging the minerals, SAESSCAM agents record volumes and tag numbers in iTSCI logbooks. These logbooks provide an effective manner of recording the movement of minerals in region, and contain information to be provided to the final mineral buyer.

Once a bag has been tagged (with unique and specific green tags) and recorded in a logbook, it is available for transportation by porters to N'jingala (*centre de négocie*¹³). Porters¹⁴ walk about 45kms with one bag, which they usually do in two days (see Figure 2). In N'jingala, 3 SAESSCAM agents¹⁵ control the conformity of the bag to the information on the logbook before it is stocked in a locked warehouse.

Once a shipment is ready to be shipped to Goma, the négociants (or its *répondant*) must declare at the SAESSCAM office in Mubi¹⁶ (about 15km from N'jingala on the road to Walikale) the weight of the shipment to be transported. SAESSCAM agents

Figure 2 Bisie-N'jingala-Walikale (in blue Alphamin's concession)



¹³ Another trading centre that had been developed by IOM exists in Isanga, but is not used for the evacuation process, presumably for practical reasons since it may not be in a location of most relevance to negotiants

¹⁴ Porters are often artisanal miners that came from other artisanal iTSCI sites for increasing their revenue. The number of porters is believed to have increased from 100 to 200 over the course of the process.

¹⁵ Two statisticians and a tax collector

¹⁶ The Mubi SAESSCAM office is the main SAESSCAM office in Walikale territory. 6 agents work there and prepare weekly reports that they send to Goma

then calculate the amount of taxes to be paid by the *négociants'* representatives at the one-stop government service in Goma. After payment, once ATMs are issued in Goma, evidence of payments and ATMs are sent electronically to iTSCI in Walikale, which forwards scanned copies of the ATMs to SAESSCAM in Mubi/N'jingala. All competent authorities (PMH, DIVIMINES, and SAESSCAM) then control the validity and the conformity of the ATM, and the shipment can leave N'jingala.

When trucks arrive in Goma, exporters take delivery of the material, and obtain upon payment of official taxes a *certificat d'origine* from the CEEC for exporting the minerals (see section II for a description of all taxes). These *certificats d'origine* will replace ICGLR certificates and will benefit from special ICGLR exceptions, under special waiver approved by the National Minister of Mines.

Cassiterite coming from Bisié exported by Goma exporters are therefore accompanied by tags, ATMs and certificates of origin, in addition to due diligence evidence provided by exporters (as per the appendix of the OECD guidance, see section II).

In practice, the evacuation process faced several challenges, which has significantly slowed down the pace of the clearance. On 14 December 2015, when the evaluation team arrived in Goma, (8 weeks after the start of the tagging process and at the end of the process originally agreed¹⁷), 804 tonnes had been tagged (about 60% of the expected stocks). Pace of tagging was only part of the issue: only 341 tonnes had left N'jingala and only 103 tonnes had reached exporters' warehouses in Goma. Two main issues contributed to significantly delaying the evacuation process:

- **The transport of minerals** to Goma is a significant challenge during the stock clearance. First of all, the poor condition of road infrastructures between Walikale and Goma greatly increases the transport time. During most of the evacuation period (rainy season), the shortest road to Goma (via Masisi, see Figure 1) was impracticable, with trucks taking up to 6-8 weeks to travel the 315 km to Goma (and some being stuck on the way). This led numerous *négociants*/exporters to decide to use the 1500 km road via Kisangani-Beni, crossing 4 provincial/district borders¹⁸. In addition to its length, this unusual journey creates laborious procedural issues for transporters, most often at the borders between provinces or districts, because of State agents being unaware of Bisié stock evacuation specific procedures, or simply not trained or sensitised to mineral transportation formalities¹⁹. Trucks taking the road via Kisangani-Beni take up to 4 weeks to reach Goma. At the time of the field visit, 32 trucks were on their way to Goma, many of them being stuck; and less than ten had arrived.
- Another important factor of delay is the **financial bottleneck in the value chain** induced by *négociants'* lack of cash flow and debts towards *creuseurs* and cooperatives. In Bisié, as with many artisanal mining sites in the DRC, *négociants* generally pre-fund *creuseurs* with part of the revenues they will generate from the production (for subsistence, fuel or equipment). Since Bisié's stocks have been produced over a long period of time, *négociants* have not been able for a long time to pay the *creuseurs* for a production that was not yet sold. When the stock clearance was authorised, *négociants* often could not pay for the whole production they had pre-funded,

¹⁷ 13 December 2015 was the end of the process originally agreed

¹⁸ Given the new DRC administration division (Maniema Province, Province Orientale Tshopo and Ituri districts and North Kivu Province).

¹⁹ Several cases of agents requesting ICGLR certificates have been reported.

and they now have to wait for the first shipment to be paid by the exporter. This creates a bottleneck in the value chain and *négociants* therefore are neither always able to pay the balance to creuseurs for their production, nor the packaging/ transport of the minerals²⁰. In such situations, artisanal miners often refuse to release more minerals, and it was even reported to the evaluation team cases where *négociants* are not welcome anymore in Bisié, because of unpaid debts²¹ (see section II). This financial blockage combined with the transportation issue described above has produced a significant slowing down in the stocks' clearance process, especially since the transportation issue tends to worsen the bottleneck. Another aggravating factor is the currently extremely low international tin price, which make *négociants* hardly able to break even.

In reaction to above issues, and in response to demands from exporters, *négociants* and cooperatives, the National Minister of Mines has successively issued two moratoria, respectively extending the process to 20 December 2015, and finally until 31 December 2015 (see *arrêté ministériel* in Annex H). However, given the two important challenges described above, pace of tagging has continuously decreased and the two extensions have not had the intended impact: before the extensions, on 14 December 2015, 804 tonnes had been tagged; on 23 December, 927 tonnes and on 31 December 2015, **at the end of the evacuation process, 980,500 kg.** (19,610 bags of minerals) The continuous reduction of the volumes tagged every week (from approximately 100 tonnes a week during the first eight weeks to 53 tonnes the last week) and the limited amount of minerals shipped or received in Goma confirm that various challenges were preventing the process from being led to its end, but also shows that full evacuation of tagged minerals to Goma could still take a significant time, given that most *négociants* have to wait for their full payments before being able to pay for a new lot for transport. Based on that analysis of the situation, and in response to several demands from stakeholders (including from the CPS, see below), the National Minister of Mines agreed on 21 December 2015 to authorise minerals' transportation by air for 60 working days (see *arrêté* in Annex H), which used to be normal practice in Walikale (see section II) but which was prohibited several years earlier as reaction to section 1502 of the Dodd-Frank Act.

²⁰ Before being shipped to exporters, minerals have to be carried from the stocking place in Manoiré to the weighing point (SAESSCAM agents in Manoiré), then re-packed (since a lot of bags in Bisié are too old and damaged to bear the long journey to Goma), and transported to N'jingala, which costs overall more than 25\$. Actors did not agree on using 25Kg bags since it significantly increases the transport cost per kg and reduces the amount a porter can expect from a trip.

²¹ It was reported to the evaluation team that numerous *négociants* have debts of more than 20,000\$. Several sources have indicated that some *négociants* were physically unable to come and pick up "their" minerals, for security reasons.

SECTION II – Description of on-the-ground assessment and ongoing risks monitoring as per the annex II and the appendix of the OECD DDG.

A. Accordance of the stock clearance process with the Appendix of the OECD DDG

The design and roll-out of the stock clearance process must relate to the Appendix of the OECD DDG. The agreement with national and local governments not only aimed to establish an on-the-ground assessment team with an appropriate level of competence and free from conflict of interests, but also multi-stakeholder oversight of the mineral evacuation process. Based on the fieldwork carried out in December and on discussions held with various stakeholders, the evaluation team confirms that PACT has been the on-the-ground assessment team throughout the whole duration of the stock clearance process and that local and national stakeholders are involved in the supervision of the process.

Various dimensions of the continuous on-the-ground assessment, compliant with the requirements of the OECD DDG Appendix, can be noted:

- **Consultation with local and central governments:** Through its presence and activity in the *Comité Provincial de Suivi* (CPS or CPP), PACT on-the-ground assessment teams have continuously consulted the Provincial and National Government before and throughout the evacuation process. The CPS includes numerous stakeholders²² and is presided by the Provincial Minister of Mines, Mr Anselme Kitakya, and the deputy president Ms Yvette Mwanza (*Directrice de la chambre des mines de la Fédération des Entreprises du Congo du Nord-Kivu*, FEC). The CPS has had an important role during the stock clearance process from Goma, including:
 - Ensuring that the tagging process was carried out in the right way, and that weight of physical stocks did not exceed declared stocks. CPS representatives visited N'jingala, along with other civil society representatives and *négociants*;
 - Regularly communicating, in real time, with involved local and national government services (National Ministry of Mines, CEEC, SAESSCAM, DIVIMINES, PMH, Administration of the Walikale territory); it is the CPS that forwarded local concerns from the CLS (see below) about mineral transportation delays to the National Minister, who consequently took the decision to authorise mineral transportation by air in order to make possible and more practical the evacuation process.
 - Discussing and managing any reported risks, in liaison with PACT and MONUSCO Walikale base. Regular communication on security incidents with the MONUSCO base in Walikale allowed the CPS to be aware of the evolution of the security situation at all times of the process. For example, this made possible the temporary suspension of mineral transportation on the Walikale-Masisi Axis after the incident NK/2015/0097 (see in

²² In addition to the President and Deputy President, the CPS is composed of DIVIMINES and SAESSCAM's provincial directors, CEEC Goma's *chef d'antenne*, the Commandant of the PMH, the *Procureur général*, a representative of the *Cadastre Minier* (CAMI), a representative of the *négociants*, of the transporters, of the *creuseurs*; civil society representatives, MONUSCO, DGM, OIM and others.

Annex A) upon recommendation from PACT (through the CLS, see below) and approval by the CPS.

- **Consultation with local civil society organisations:** the *Comités Locaux de Suivi* (CLS), which are forums assembling local stakeholders, offered the possibility to PACT teams to regularly consult with local civil society organisations and traditional leaders and to setup a **local and continuous monitoring process**. The CLS of Walikale was already formed as part of the iTSCI normal implementation in the Walikale Territory.
 - In Walikale, the CLS is presided by *l'Administrateur du Territoire* and occurs every month. In addition to PACT are represented DIVIMINES, SAESSCAM, PMH, *négociants* and the *chefs coutumiers* (traditional authorities). The CLS of Walikale had an important reporting role during the process: it has been the place where *négociants* could raise the issue of transportation delays, as well as report some incidents that happened on the road to Goma via Kisangani (regular administrative slowness at Provincial and district borders because of state agents who did not fully understand the procedure).
 - The CLS in Walikale has also been the forum for discussing community concerns and putting into perspective the future of artisanal mining activities in the Walikale territory. The CLS regularly feeds information into PACT teams in relation to artisanal miners and cooperatives' concerns. This is where most of the discussions about the future of Bisié and necessary transfers of Bisié's cooperatives to new iTSCI sites in Walikale was discussed (see section III).
 - There has also been a weekly CLS in Bisié/Manoiré since 11 October 2015. The President was Mr Kitumani, the traditional leader of Manoiré and the Deputy President is Mr Maurice Mahamba, DIVIMINES local *chef d'antenne*, who has also supervised the tagging process in Manoiré. Local cooperatives, SAESSCAM and PACT were also represented. During the process, the CLS in Bisié has mainly addressed tagging technical issues, resolved some conflicts between persons in charge of warehouses and also discussed security concerns in the area.

PACT's permanent presence in these various forums has enabled the **assessment teams to be aware of the main concerns in the community and in the value chain and to share information gained throughout the entire supply chain**. During the evacuation process, two PACT staff were based in Goma, two others in Walikale and one PACT geologist had been seconded to Bisié/Manoiré, supported by a consultant contracted for the period. Overall, PACT teams have contributed to a continuous monitoring of risks and incidents during the evacuation process by coordinating and facilitating the monitoring of risks with a range of local, provincial and national stakeholders, enabling them to react to various issues that emerged during the clearance process.

B. Risks identified related the Annex II and to the appendix of the OECD DDG.

As part of its ongoing on-the-ground assessment of the factual circumstances of mineral extraction, trade, handling and export, PACT has identified and reported several annex II risks in relation to the evacuation process. Some of them relate to tagging procedures and others to human rights and security issues. The list of incidents identified during the 11 weeks of the stock's clearance is available in Annex A, and more background information on the historical period leading up to the evacuation process can be seen in Pact

BISIE SECURITY REPORT 2010-September 2015. Throughout the process, no incidents of major concern in relation to the militarisation of Bisié site by non-state armed groups was identified. However some security incidents and informal taxation points were observed on Bisié minerals transportation routes. Serious incidents identified by PACT during the evacuation process period (level 1 or 2²³), and associated mitigation measures, are summarised below:

- **Security - NK/2015/0095, level 2:** In the night of 26-27 October 2015, in Walikale town an FARDC munitions depot was attacked by unidentified bandits. A FARDC soldier was killed, and weapons including munitions boxes were stolen. The attack resulted in unrest by FARDC soldiers, protesting against the attack. See section III for more details. On 30 October, two workers from NGO Concern were abducted on the Walikale-Masisi-Goma road. The incident did not have direct links with Bisié minerals' evacuation process but was discussed at the local and provincial level, respectively at the CLS and CPS, which advised all négociants/transporters to temporarily stop mineral transports on the Walikale-Masisi axis. Monitoring of the security situation has then been performed along the transportation route by the CLS in Walikale, in liaison with MONUSCO base.
- **Security - NK/2015/0097, level 2:** At the end of October, several road attacks were reported on the Butembo-Goma road, and were committed by bandits (allegedly with possible links with FDLR). The rebels looted some busses, and stole valuable goods from the passengers. As a result, transporters went on strike to protest against the insecurity. This incident was not related to Bisié minerals' evacuation process but happened on the axis Butembo-Goma, a route that is used by transporters from Bisié, both because of the security situation and poor condition of the road on the Masisi axis. However these attacks did not happen at the exact time of transport. Tagging started around 13 October and incidents occurred about 19-25 Oct. It takes about 2 weeks to get from Bisié to Lubero, so no minerals were there at the time of the incident. Since then, FARDC arrested six bandits and continues its operations against the rebel group FDLR, and PACT followed up on the security situation (see incident report in annex).
- **Illegal taxation - NK/2015/0115, level 2:** In Kisangani, ANR (Agence Nationale de Renseignements) agents were collecting illegal tax from vehicles transporting minerals (Bisié stock). Since the iTSCI programme is not operational in Province Orientale, there is a lack of sensitisation and knowledge of different services about the programme and ANR services would have thought that these minerals were being smuggled out of the country. Therefore, the FEC, as part of the CLS, contacted the ANR and CEEC in Kisangani to let them know that the minerals were not being smuggled out and that the services had to free those minerals. However the two services refused to do it. Meanwhile, the transporter did not want to wait any longer and paid the fees that were asked by ANR officers. Exchanges between the Governor of North Kivu and the Governor of Province Orientale should prevent such case to happen again. According to the evaluation team, this incident is therefore more to be attributed to individual one-off practices rather than institutionalised and recurrent issues, and has not therefore contaminated several shipments. Additionally, iTSCI identified that risk through incident NK/2015/0115 regarding illegal taxes collected by ANR agents in Kisangani. The Walikale CLS sent a letter to the provincial minister of mines and the provincial minister to denounce the abuses. The situation has

²³ Levels of incidents range from 1 to 3, 1 being the most serious. Information on all incidents is provided to iTSCI members each month, and after a period of time, are made public at;

https://www.itri.co.uk/index.php?option=com_mtree&task=listcats&cat_id=198&Itemid=11

reportedly improved since (December CLS meeting), but the names of the ANR agents and whether they were punished remain unknown.

- **Illegal taxation - NK/2015/0123, level 1:** According to observations made by iTSCI staff and the evaluation team and corroborated by representatives of the civil society in Walikale, FARDC were illegally collecting taxes on the Bisié-N'jingala path. The tax collection was taking place at four barriers. At N'jingala barrier, the following security services were identified: DGM (*Direction Générale des Migrations*), ANR, and a representative of the territory as well as FARDC 84th Sector. According to information collected, the tax of 500FC (0.53\$) per person passing by the barrier is allegedly divided among all these services; although the actors involved denied it. A fixed and legal tax on goods transported is also received by the sector (administrative entity). At Musheba FARDC perceive 500 FC per person. At Mafilifili FARDC perceive 500 FC per person and a representative of the territory is also present. And at Bisié, FARDC receive 200 FC (0.2\$) per person and traditional authorities also receive two taxes: 500 FC per person and a fixed tax on goods transported. PACT inquired about the rationale behind the taxation and associated risks. The taxes received by FARDC dates from 2012, at a time when economic actors in Bisié and Manoiré (including stakeholders involved in mining, but also retailers working in Manoiré) were sometimes looted by bandits or armed groups on the Bisie-Njingala track and therefore asked FARDC to secure the path. FARDC were subsequently deployed between Bisié and N'jingala in order to maintain security of porters against armed groups and bandits. This structure has remained until today. Although it should be highlighted that no receipt is delivered and that there is no legal basis for the taxes perceived by FARDC, nor contract signed between FARDC and economic operators, all local stakeholders interviewed by PACT during 11-17 November 2015 (*négociants*, cooperatives, and porters) seemed to agree to pay these taxes, which achieves security of the path. Since the beginning of the transport of Bisié stocks, no violations of human rights by FARDC were reported on that path. A CLS meeting was held on 25 January 2016 between numerous stakeholders, which highlighted that the presence of the FARDC on the path Bisié-N'jingala was a request from the *Administratrice du Territoire*, and that their presence was necessary because of the lack of PMH staff in the area. Colonel AKILIMALI SHEMONDO confirmed that the FARDC presence aims to secure the path and affirms that no claims or grievances were reported during the evacuation process. Local stakeholders also committed to ensure, if such informal taxation were to happen again, that a more open and prior communication would happen at the CLS. The evaluation team considers that this informal taxation, and the associated risk of supporting public security forces, has been effectively identified and mitigated according to the OECD DDG.
- Another issue raised during the process relates to minerals that seem to have been produced before 2012, and therefore possibly having benefitted armed groups that were present in the area during that period (see section III and BISIE SECURITY REPORT 2010-September 2015 by PACT). According to the Divimines records of the residual stocks, some minerals may have been produced in 2011: 8,850 kg in February, 4,000 kg in March, 2,700 kg in June 2011 and 1,250 kg in August 2011, in each case by a single team of miners. In the first case, for minerals reportedly produced in February and March 2011, it was when the demilitarisation had already started and PMH was already at the site, and before the first reported presence of Sheka in Bisié since the ban was lifted. The other cases, for June and August, however relate to a period when Sheka was

controlling Bisie. As a mitigation, PACT informed the corresponding processors/exporters²⁴ (risk incident NK/2016/0046) that these minerals – if arrived at their facilities – should not be mixed and should be put aside. The evaluation team considers it corresponds to an acceptable mitigation measure in order to avoid stock contamination.

Alongside above risks in relation to the annex II of the OECD DDG, the evaluation team also found during the fieldwork several discrepancies between the initial agreement and the actual evacuation process, including:

- **The authorisation of minerals' evacuation by air**, granted by the National Minister of Mines, also revises instructions given by the CEEC director on 27, July 2015, who had specified that transporters should proceed with clearance along specified transport routes to specified destinations (Walikale-Goma either via Bukavu, Masisi or Kisangani). The evaluation team does not consider that the ministerial authorisation of minerals' transportation by air constitutes a major risk for Bisié stocks' traceability. It does not contribute to risks that would undermine the control over the volumes by the authorities, as well as the amount of information available with the mineral. State agencies should still be able to monitor the volumes throughout the whole duration of the evacuation process, and to keep track of the traceability and official payments' records along specified transport routes. However, if not effectively monitored, it could potentially offer the possibility for other minerals to be transported the same way, without either appropriate authorisations or traceability, by making the transportation quicker and cheaper for négociants/transporters who would like to ship other minerals than Bisié's to Goma. However this risk is being mitigated since DIVIMINES and SAESSCAM agents closely monitor plane loading at Kilambo airstrip, in order to prevent any minerals infiltrating from other sources and/or illegal taxation incidents, as requested by the National Minister (see letter in Annex H). The process also raises uncertainties in terms of safety. According to interviewed exporters and FEC representative, it is currently challenging to find companies or airplanes able to provide that service securely²⁵. Also, such a volume shall require regular trips between Goma and Walikale and that planes will have to use the Kilambo airstrip (literally the road between Walikale and N'jingala) for landing and take-off. This road was infamous during the Bisié *Grande Époque*, between 2006 and 2010, when several planes a day were using the airstrip and armed groups benefiting from the exploitation/transportation²⁶.
- **Transport in 50 kg bags**. On 3, August 2015, the technical mining commission composed of representatives from the various State mining agencies²⁷ had agreed that minerals would be packed at the mine into 25 kg bags. Later in the process it was finally decided that minerals would be transported in 50 kg bags, for technical, financial and time reasons (see above). The

²⁴ These stocks were identified and PACT has alerted the two related exporters: HTC and Metachem. At the time of this report, minerals had been put aside for HTC and the minerals were still being transported to Metachem. This company was informed and agreed that these minerals have to be put aside.

²⁵ The letter issued by the National Minister mentions that five specific airplanes will have to be selected, see Annex H

²⁶ Global Witness, in *Under mining peace* in 2005 noted that "Soldiers [were] 'taxing' the miners at the mine site and at roadblocks along the road between Bisie and Mubi, where the airstrip is located. Mineral exploitation in Walikale has always been controlled by the military, be they Mai-Mai, RCD-G or FARDC troops"

²⁷ Provincial Minister, CEEC, SAESSCAM, DIVIMINES.

evaluation team does not consider that this shift induces a risk for the traceability process. While concerns as to porters' working conditions exist since they will carry 50 kg bags on their backs for almost 50 km, this has been the normal situation for this remote site for years and will not continue once stocks have all been transported.

- The evaluation team noticed whilst in Manoiré that **artisanal miners are still occupying and exploiting two artisanal areas in Bisié** (camp 5' and camp 15'), in spite of the Governor of North Kivu's Provincial order²⁸ suspending all artisanal activities In Bisié, while the third was closed in March 2015 (see section III). Cooperatives' representatives denied the issue and justified the presence of miners by claiming that miners had to stay on site during the rainy season in order to avoid pits flooding. However the evaluators directly observed approximately 150-200 miners on site (more than what would be expected to be required for maintaining pits) including some ascending the hill and taking bags of minerals down to Manoiré. This might reflect a higher total number assuming various shifts were being worked. The evaluation team could not gather any direct evidence of these recently produced minerals being tagged in Manoiré, but considers it as a possibility: the initial stock inventory was carried out in June in Manoiré and the tagging process effectively started in October. During these three months, inventoried minerals could possibly have been sold elsewhere in the Walikale territory, including via iTSCI sites²⁹, and then substituted in Bisié stocks by newly produced minerals. Although possible, the likelihood of such a practice on a large-scale basis is very low because of distances and transportation challenges (cost and time) between mining sites, hence it would be anyhow of limited extent by comparison with the total volumes inventoried in Manoiré in June 2015.
- **Extension of the tagging process to 11 weeks and failure to clear all Bisié stocks within 2 months:** the tagging and clearance processes initially agreed on by the CEEC director was supposed to last a maximum of 8 weeks. This short timeline was not realistic and the National Minister of Mines agreed to extend the tagging process until 31 December. However even with the deadline extension not all stocks have been tagged and it is estimated that there remains approximately 370,000 kg of non-tagged cassiterite in Manoiré. As to the stock's clearance process, and even though air transportation should accelerate the process, it is still difficult to estimate the remaining time that will be required by the various operators to perform the full export operation. This is especially exacerbated by the length of time it may take to achieve agreement on exports from buyers.

²⁸ No-1/215/CAB/GP-NK/2014

²⁹ On 28/05/2015, iTSCI raised two incidents: incident # NK/2015/0044; CEEC agents based at CMM entity took delivery of 41 bags of red cassiterite, although the official documents delivered with the minerals mention black cassiterite. Red cassiterite is allegedly only produced in Bisié (non-iTSCI site); and incident # NK/2015/0043; at the reception of 39 tagged cassiterite bags at Huaying comptoir, state agents noticed that one mine tag was missing, and that the minerals are red, although the different official documents stated that the cassiterite is black. Red cassiterite is allegedly only produced in Bisié (non-iTSCI site). On 20/11/2015, iTSCI raised another incident in relation to Bisié (NK/2015/0106); In July, HTC exported eight tonnes of minerals which were obtained after processing the tailings of the Bisié stock. The minerals were exported untagged with a Certificate of Origin delivered by CEEC, making this export legal. The company assumed that attaching the OECD minutes was sufficient. This export has been rejected by the smelter pending further clarification on an appropriate way forward with this incident.

Overall, despite the above mentioned annex II risks and discrepancies against the OECD DDG appendix, the evaluation team can confirm that the stock's clearance process and associated on-the-ground assessment by **PACT has so far created enabling conditions for effective due diligence, risk assessment and mitigation by exporters**, including **by maintaining information on suppliers and the circumstances of mineral extraction, trade and transport**, as described in this section. Exporters should therefore be able to carry out a comprehensive and effective due diligence on these purchases.

C. Analysis of stakeholders' reactions and socioeconomic benefits of the evacuation process

As part of the assignment the evaluation team conducted interviews with all stakeholders involved in the process: Authorities, economic operators (from artisanal miners and *négociants* through to exporters), customary leadership and civil society representatives. These numerous interviews led the evaluation team to note all stakeholders' expectations of seeing the evacuation process come to a successful conclusion:

- **Provincial and National authorities** are supporting the process for two main reasons: they first mention the taxes that will be collected (see fiscal forecast in Table 1) and that it will benefit the population (see economic forecast in Table 2), but are also supportive of the process since they consider it is a preliminary and necessary step for the industrialisation of the Bisié area, which will also bring considerable fiscal benefits as well as potentially development benefits such as improved infrastructure (see prospects in section III).
- **Artisanal miners and cooperatives** present in Bisié and met by the evaluation team have all shown much enthusiasm and eagerness to be allowed to sell their minerals, after many years without any marketing opportunities, and were grateful for this authorisation. However they regret that the authorisation was only temporary³⁰ and above all expressed concerns about future industrial developments in the area. Artisanal miners' concerns about the industrialisation take root in a long-term dispute between local cooperatives and MPC/Alphamin about Bisié mining areas, which today poses a potential risk to the improving stability of the area (see section III).
- **Négociants** have been amongst the most active advocates of the evacuation process. Because of the usual roll-out of the artisanal mining value chain in the DRC³¹, and since Bisié's stocks have been continuously accumulated over the past years because of above mentioned marketing challenges, many in-region *négociants* have got into substantial debts. Amongst the 227 *négociants* registered in the *Association des Négociants de Minerais du Nord-Kivu*³² (ANEMNKI), 89 have got into debt in relation to Bisié's stocks³³. A rough estimate of the average debt per

³⁰ Artisanal mining cooperatives in Bisié have been asking for a long time the full validation of Bisié artisanal mining sites by the validation mission (undertaken by a multi-stakeholder group composed of several stage agencies, government representatives, MONUSCO, IOM, civil society members and NGOs).

³¹ *Négociants* generally pre-fund *creuseurs* with part of the revenues they will generate from the production (for subsistence, fuel or equipment). Then they deduct these pre-funded amounts from the amount they pay to *creuseurs* for the production.

³² Association of *Négociants*

³³ Figure given by the President of the Association

négociants amounts to approximately USD 15,000 per négociant³⁴; it was reported to the evaluation team that some *négociants*, prior to the evacuation process, had got into debts of more than USD 40,000. All interviewed négociants are therefore extremely keen to see their stocks exported, at least when they have enough money to pay for the packaging and transport of their minerals³⁵, and even if most of them will not be able to breakeven given current international tin market prices. Over the past year, the situation of Bisie's stocks has therefore also prevented in-region négociants to significantly invest in other new iTSCI Walikale artisanal mining sites, whose development and potential has suffered from that financial bottleneck. All interviewed négociants declared that the export of Bisie's material would allow them to reinvest their cash-flow in new non-Bisie Walikale iTSCI sites, which could have a positive side effect on artisanal miners - currently benefiting from Bisie production - by offering them a satisfactory transition opportunity. All interviewed négociants have also declared that once Bisie's stocks would be exported they would stop investing in the artisanal mining production from Bisie, which is now of a lower grade than previously produced.

- **Exporters** are also supporting the process insofar as it offers them new sources of mineral supply. The two interviewed exporters³⁶ also mentioned the positive impact that the evacuation would have on the whole minerals' supply chain, enabling *négociants* and themselves to reallocate their investments towards recently opened non-Bisie Walikale iTSCI sites.
- **Bisie customary authority and local community** (Manoiré) shall also benefit from the minerals' evacuation process to the extent that for each bag of minerals being evacuated, négociants have to pay 4,000 FC to the authority (for land rights, see below), which overall amounts to more than 80,000 USD³⁷.
- **Alphamin Bisie Mining** stated its non-objection to the stock evacuation process (as previously noted); in addition to job and sub-contractor opportunities that may arise from the industrial development of Bisie, ABM through the Lowa Alliance plans to invest in alternative livelihoods to offer to artisanal miners and declares wanting to support the Congolese Government in validating additional ASM sites and capacity building of the cooperatives that represent the choice of ASM miners, all of which should bring more stability to the area.

The stocks' clearance process, if led to a successful conclusion, shall bring significant financial benefits to the Walikale Territory and to the North Kivu Province, as well as to the wider Congolese economy. A breakdown of all taxation payments paid to territorial, provincial and national authorities can be found in Table 1. An estimate of the overall added value for the Congolese economy can be found in Table 2. Both tables underline the benefits that the Congolese economy as a whole can draw out from the process. The various actors of the value chain would significantly benefit from the process, which will allow them to reinvest in iTSCI sites in the province and reinvigorate the 3T minerals' sector in Eastern DRC. Authorities

³⁴ A négociant generally pays 50% of the production upfront as an investment. This average figure of 15,000 \$ relies on the assumption that a *négociant* has pre-funded, as an average, a production of 15,000Kgs (1,350,000 kg divided by 89 négociants), an average amount of 1\$ / kg (which would represent approximately 900 Congolese Francs). The price of a kilogram in Bisie is nowadays of about 1,500 FC but used to be much higher.

³⁵ Several sources have indicated that some négociants were physically unable to come and pick up "their" minerals, for security reasons, because of unpaid debts (see section I)

³⁶ Établissements Amur and METACHEM

³⁷ 980,000 kg in 50 kg bags makes 19,600 bags, multiplied by 4,000 equals to 78,400,00 FC (or 87,000 USD)

(Ministry of Mines, National agencies, Province, Territory and chiefdom) would overall collect about 750,000 USD, including approximately 55,000 USD to be collected by Walikale Territory³⁸. The Administrator of the territory³⁹ declared to the evaluation team that this amount could be used for purchasing a tipper truck, which would enable the Territory to start the restoration of the Walikale-Masisi section of the road to Goma and open the area for improved economic opportunity.

³⁸ 5% of *Frais rémunératoire pour services rendus* and +/- 27% of the *Fonds communautaire*

³⁹ Marie-Claire Bangwene Mwavita

Table 1 Estimates of all taxes to be collected by the Congolese Authorities throughout Bisie stocks' clearance process

Level in the supply chain	Collection agencies -Authorities	Beneficiary agencies -Authorities	Tax name	Percentage of product - value	Total amount to be collected ⁴⁰
Miners/Négociants	FARDC - Bisie	FARDC	Taxe de sécurité	200 FC per bag of 50 kg	+/- 3,900 USD
Miners/Négociants	FARDC - Mafilifili	FARDC	Taxe de sécurité	500FC per bag of 50 kg	+/- 9,800 USD
Miners/Négociants	FARDC - Musheba	FARDC	Taxe de sécurité	500FC per bag of 50 kg	+/- 9,800 USD
Miners/Négociants	Secteur	Secteur	Taxes sur biens transportés	500FC per bag of 50 kg	+/- 9,800 USD
Miners/Négociants	N'jingala	DGM, ANR, Territoire & FARDC 84th Sector	Taxe de sécurité	500FC per bag of 50 kg	+/- 9,800 USD
Miners/Négociants	Guichet unique SAESSCAM - Goma	SAESSCAM	Frais rémunératoire pour services rendus	10% of current price	+/- 179,000 USD
Négociants	Bisie customary authority	Bisie customary authority	Droit de terre	4,000FC per bag of 50 kg (+/- 2.50 % of current price)	+/- 87,000 USD
Négociants	Brigade Routière – Service Transport, ANR	Brigade Routière – Service Transport, ANR	Péages – barrières tarifaires	3 barriers of 20 USD per truck on the road Walikale-Goma (via Kisangani)	+/- 4,500 USD
Négociants	Guichet unique SAESSCAM	SAESSCAM	Frais rémunératoire pour services rendus	1% of current price	+/- 35,800 USD
Négociants	Guichet unique SAESSCAM	Direction Générale du NK	Frais de délivrance de l'ATM	1% of current price	+/- 35,800 USD
Négociants	Guichet unique SAESSCAM	Divimines / Gouvernorat de Province	Taxe de transport	0.05\$/kg (+/- 1.25% of current price)	+/- 40,000 USD
Exporters	Province du NK	Territoire de Walikale, Province du Nord Kivu	Fonds communautaire	US\$180 / tonne	+/- 176,000 USD
Exporters	CEEC	Ministère des Mines, DGDA, CEEC, OCC, OGEFREM, DGRAD	Taxes rémunératoires	1% of current price	+/- 56,000 USD
Exporters	DGDA	DGDA	Droits de douane	1% of current price	+/- 56,000 USD
Exporters	Province du NK	Clef de répartition- Territoire de Walikale	Contribution aux entités décentralisées	1% of current price	+/- 56,000 USD
				Total of informal taxes to security	+/-33,000 USD
				Total of informal taxes excl. security⁴¹	+/- 100,000 USD
				Total of legal taxes	+/- 635,000 USD

⁴⁰ Total amounts cannot be calculated precisely given that current prices at various stages of the supply chain can significantly vary, and are confidential information. Estimates are based on the following prices between June and December 2015: miners selling at 1,700 FC / kg; négociants buying at 2,200 FC (incl. transport) and exporters selling at 5,000 FC. These figures are estimates and do not reflect current prices declared by the actors of the value chain. Négociants used to buy at much higher cost. Exchange rate of 1\$=900 FC

⁴¹ Informal taxes are taxes that are perceived without official receipts.

Table 2 Estimates of the potential overall economic benefits of the stocks' clearance process for the Congolese economy⁴²

Position in the value chain	Estimate sales value, per kg in FC	Overall estimate sales value, in USD	Added Value, in USD
Miners	+/- 1,700 FC	1,850,000 USD	1,850,000 USD
Porters	+/- 500 FC	540,000 USD	540,000 USD
Transporters	+/- 200 FC	217,000 USD	217,000 USD
Taxation paid by négociants ⁴³	+/- 400 FC	435,000 USD	435,000 USD
Négociants	+/- 3,200 FC	3,484,000 USD	442,000 USD
Taxation paid by exporters ⁴⁴	+/- 310 FC	337,000 USD	337,000 USD
Exporters	+/- 5,000 FC	5,440,000 USD	1,619,000 USD
			5,440,000 USD

⁴² Total amounts cannot be calculated precisely given that current prices at various stages of the supply chain can significantly vary, and are confidential information. Estimates are based on the following prices between June and December 2015: miners selling at 1,700 FC / kg; négociants buying at 2,200 FC (incl. transport) and exporters selling at 5,000 FC. These figures are estimates and do not reflect current prices declared by the actors of the value chain. Négociants used to buy at much higher cost. Exchange rate of 1\$=900 FC

⁴³ See Table 1

⁴⁴ See Table 1

SECTION III – Risks and opportunities of the Bisié mine industrialisation, and possible security issues in the area

During the last past years the accumulation of significant stocks of cassiterite in Manoiré and the continuous presence of artisanal miners on-site has restricted the construction and development of an industrial mine on the site by Alphamin. The authorities support the objectives of Alphamin and have previously introduced various measures to reduce continued artisanal mining on the site⁴⁵, amongst which the agreement to evacuate these stocks, which was welcomed by all stakeholders. It is now expected by the authorities that clearance of stock would encourage artisanal miners to leave the site, provide a final resolution of this situation and allow the development of the industrial mine. Although the development of an industrial mine shall bring various benefits to the North Kivu Province (III.A), it may also face substantial obstacles and it entails various potential risks, including the risk of continuing long-standing tensions in the area (III.B).

A. Opportunities related to the Bisié mine industrialisation

In August 2011, Alphamin Resources Corporation, a Toronto Venture Exchange listed tin explorer and developer⁴⁶, acquired a majority interest in the Bisié Tin project in Walikale territory, North Kivu, in the DRC. 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. Force majeure was requested by on its PR title in 2007 and which was in place between 2009-2012. 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). 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. Concurrently with social tensions related to the industrialisation (see section III.B), various stakeholders are welcoming Bisié tin mines industrialisation and are expecting social and economic benefits, such as:

- Industrial prospects given by the company⁴⁷ indeed reflect potential **significant revenues** to the Province and the Congolese State. The company expects to mine 0.5 million tonnes per annum to produce 9,000 tonnes of tin-in-concentrate per annum over 10.5 year mine life. It is difficult to estimate the added value of such production over the medium term for the Congolese economy given the number of uncertainties (level of local content, international market prices, taxes etc.). At current international tin prices (December 2015), such production (after five years) would generate an overall sales value of more than 175,000,000 USD per year, significantly benefitting to the DRC in terms of Foreign Exchange and tax collection.

⁴⁵ Including the physical evacuation of one of the three artisanal mining sites in Bisié (Camp 45') in March 2015, see section III.B

⁴⁶ See <http://alphaminresources.com/>

⁴⁷ <http://alphaminresources.com/3538-2/>; 23rd February Press Release

- **Employment** is another possible factor of development for the Walikale Territory. The company declares⁴⁸ that during the 3-year construction period it will employ approximately 700 people. During the operation phase the company expects to create approximately 450 permanent local jobs. Having recourse to local companies during construction and for service delivery during operations could increase the overall positive effect on employment.
- In terms of **social development**, the company identified 36 affected villages⁴⁹ and communicated to the evaluation team that it is in process of incorporating a Community Trust, which will be funded by 4% of the direct project expenditure excluding DRC taxes. The evaluation team could observe in one of the affected villages that the company is currently in a local recruitment process for undertaking stakeholder consultations. The Company has also improved the teaching and learning ability of a school in the Logu area (see Figure 2) by supplying the school with teaching aids and stationary for all children.
- In terms of **infrastructure**, the company has started to clear the way for building a 32 km road between Bisié and Biruwe (see Figure 2). The road is currently being cleared by hand and is expected to be completed in August 2016. ABM currently is employing 325 local residents on the roadwork, including former ASM miners. In spite of regular demands from various stakeholders, the company does not envisage the possibility to contribute to road improvements between Goma and Walikale, considering it would entail excessive costs.

Alphamin recognizes that the success of the project relies entirely on the full support of local communities, and is committed towards the socioeconomic development of the Walikale territory. However there remain challenges in carrying the industrialisation project forward in an ideal way because of a persistent tension with local artisanal miners.

B. Current tensions with artisanal miners and related security concerns in the area of Bisié

The Walikale territory has faced the permanent presence of armed groups and conflicts for the past decade. This report does not either tackle the long-term roots of instability in the region or provide a long description of the various armed groups that have been operating in the area. For more background information on the long-term security situation in the Walikale Territory, refer to BISIE SECURITY REPORT 2010-September 2015 produced by PACT. Alongside these regional security risks, tensions were observed between the companies MPC/Alphamin, who have held exploration and exploitation licences in Bisié (see above), and artisanal miners who declare to have discovered Bisié before the concession was registered by the company MPC. This section aims to describe the current security context and risks in the Bisié area, recognising and contextualising some of the existing tensions with past events that affected Bisié's artisanal mines and communities, whether or not these have impacted the stock evacuation process.

According to some sources, Bisié artisanal mine sites have been operational since 1982 when it was run by the traditional chief and his clan. However other sources refer to a beginning of ASM operations in 1999

⁴⁸ Idem

⁴⁹ In *Groupement* Wasa: Biruwe, Kwalube, Obianda, Mafombi, Logu, Kwakokoli, Olema, Kanyama, Njingale. In *Groupement* Utunda: Osokari, ElibaMakuta, Kamiteso, Mubi, Bilobilo, Kasangano, Kilambo, Boboro. In *Groupement* Bakusu: *cité* de Walikale its 7 quartiers. *Groupement* Banabangi : Kirundu, Hewa Bora, Nyamitaba, Kakuku.

in the area. In 2006, the site was allocated to MPC by CAMI⁵⁰. Among other companies, MPC until that time was purchasing minerals from artisanal miners and from COMIMPA⁵¹, but stopped doing so when it tried unsuccessfully to begin exploration activities in 2006. Various tensions may have existed between individuals or groups committed to supply different buyers. Quickly, disagreements arose between MPC and COMIMPA which led to a second cooperative, COCABI⁵², being formed. COCABI had many members and sided with MPC representatives, but it did not have the traditional rights and support which COMIMPA had. Still today, in terms of number of members, it seems that COMIMPA is the weaker organization but it appears to consider that it has a stronger claim to the site. In 2011 Alphamin acquired a majority interest in the project. At the same time, the Conflict Free Smelter Program's April 2011 deadline for fully traceable minerals created circumstances that led to the de-facto embargo across many in region mining areas. However tensions over land claims already previously existed: in March 2010, a Protocole d'Accord was drawn up between DIVIMINES Walikale, COMIMPA, COCABI, Société Civile, MPC and ACADEWA (Association de Défense de Droit des Coutumiers Auchtoctones de Walikale) and cooperatives were at that time expecting CAMI to come to delineate 9 carrés allocated to artisanal miners, which was finally never done. It is not a binding agreement for Alphamin, even though cooperatives are still today referring to it for supporting their apparent claims over the land. Another cooperative has been operating in Bisié for a few years, COMIDER.

Alongside these conflicted claims over land, the Bisié mine is also infamous either for interference of FARDC rogue brigades (including 85th and 212th Brigade of FARDC) in the mine of Bisié until 2011, and then presence and/or control of the mines by armed groups like Mai-Mai Sheka and Simba until 2012. In 2011 and early 2012, NDC elements (Nduma Defense of Congo) of the Maï-Maï Cheka were present in Bisié for a period of eight months and were responsible for looting goods, hassles and interfering in artisanal operations. In August 2013, fifty SIMBA elements arrived at Bisié, aiming to settle their accounts with the Nyanga community (ethnic conflict). In July 2014, Maï-Maï Cheka attacked Alphamin facilities, destroying several machines and drill cores in Bisié. The same day, miners from the three cooperatives reportedly attacked MPC facilities and destroyed equipment. Subsequent to the attack the Governor of North Kivu issued a Provincial Order⁵³ suspending all artisanal activities and issued instructions to the artisanal miners to vacate the area. Since the Governor's order, the number of artisanal miners at Bisié has been overall decreasing⁵⁴, general security situation in and around Bisié has improved, and no direct interference of armed groups in artisanal mining operations was observed.

However in 2015 two events continued to strain the relations between the artisanal miners and Alphamin:

- On 6, March 2015, according to official public investigations (see official report in annex J), 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

⁵⁰ Permis de Recherche 5256

⁵¹ Coopérative Minière de Mpama Bisié, formally created in 2006.

⁵² Coopérative des Creuseurs Artisanaux de Bisié

⁵³ No-1/215/CAB/GP-NK/2014

⁵⁴ There have been reports of thousands of miners working in Bisié at certain times. Number has been overall decreasing since 2014 (also after the closure of one the artisanal areas –camp 45'-) and the evaluation team, based on December 2015 visual observations, would now estimate their number at about 300-500 overall.

miners had first started to shoot on policemen, reportedly using women as human shields. Two miners were then arrested⁵⁵ although their leader, presumed to be named Benjamin and a former Mai-Mai, has not been arrested to date. The PMH section of 30 personnel and dealing with the situation were contracted by Alphamin for protecting their staff and facilities according to DRC law following the July 2014 attack by Sheka (under *Commandant* Batende Kubita's command). The evaluation team also heard differing versions of the event⁵⁶, with all versions mentioning the use of weapons during the incident. At the time of the visit, cooperatives declared to the evaluation team that FARDC had been called for Alphamin's security consequently to the incident, which the artisanal miners interviewed by the evaluation team perceived as a threat for their own security, revealing a continuation of tensions in the area. Alphamin states that the company did not request FARDC support. Today, it is reported that there are approximately 20 armed FARDC located in or near the Alphamin concession who secure the area against potential armed groups as part of their regular mission, and may thus carry out occasional inspections rounds within the concession of their own volition.

- In the night of 16-17 November 2015, the operations manager of a Bisié cooperative⁵⁷ was abducted by unidentified men in Bisié. The evaluation team gathered two different versions of the event⁵⁸. Whatever the exact events were, this incident was perceived by local cooperatives as a threat and indicates continuation of tensions given how close those cooperatives appear to believe are FARDC and Alphamin's relations.

Given these existing long-term tensions, the evaluation team considers that some past events (notably July 2014 attacks of Alphamin's facilities) are examples of incidents that could be repeated if the tension between artisanal miners and Alphamin is not managed in an improved manner by Congolese authorities. Continued challenges, including high profile presence of FARDC, could irreparably affect Alphamin's social licence to operate and furthermore exacerbate security risks in the Bisié area. Potential issues could include;

⁵⁵ No information was found by the evaluation team on whether these miners were actually prosecuted and condemned.

⁵⁶ According to Bisié's cooperatives, policemen violently chased them away from chantier 45' and 26 houses were burned down, a woman was raped and 36 people were injured, including five seriously. According to the operating cooperative at the site 106,906 kg of cassiterite was also looted. No official investigation confirmed this version of the event. The PMH *Commandant d'Escadron* Germain Kabaka declared during an interview with the evaluation team that PMH agents used rubber bullets on miners, and agreed that they burned down artisanal miners' precarious shelters on-site (but not "houses").

⁵⁷ COCABI

⁵⁸ According to local cooperatives, he was then found the following day near Biruwe and seemed to have been tortured. According to them, Capitaine Shabani, from the FARDC based in Biruwe, had come the day before the abduction for requesting plastic from the cooperatives, usually used for packing bags of minerals. They declared that the same material had been found on the operations manager, used as plastic restraints. They declared having perceived this incident as a direct threat by local FARDC. Other sources indicate that it was approximately 3 days later that this person was found in a small artisanal mining concession near Biruwe. As he was being looked for, the military in Biruwe brought him back to the base in Biruwe. In his statement to the military there, he says he was abducted after being injected with something in his arm, and was taken into the forest. He further stated that he managed to convince one of his captors to release him after giving him some money.

- Reduced activity of miners could strengthen nearby Mai-Mai Sheka⁵⁹, which would welcome artisanal miners that often do not have places to go or other livelihoods than artisanal mining to rely on. This is especially true since Mai-Mai Sheka reportedly has historical connections to artisanal mining groups and communities in Bisié (especially with the *Banyanga, clan Nyanga*) and have regularly threatened to reattack Alphamin facilities⁶⁰. This can be mitigated through provision of other opportunities.
- Discontent among miners if dispersed without consistent and prior communication by Congolese authorities⁶¹ could also be utilised by actors looking for support for a potentially newly created armed group: In the night of 26-27 October, 2015, in Walikale town an FARDC munitions depot was attacked by unidentified bandits. A FARDC soldier was killed, and weapons including munitions boxes were stolen. According to information gathered on the field, a new armed group was created⁶² and allegedly received the weapons stolen in the FARDC depots. This group is reportedly composed, among others, of one former Mai-Mai Simba known as Sombo Desiré. There are also rumours that, once built and organised, this group is planning to attack Bisié, and would currently be in the forest, collecting weapons, communication means and recruiting men⁶³. This can be mitigated by good communication to miners of other opportunities.
- FARDC presence in the area (in relation to above mentioned incidents) appears to increase discontent among stakeholders in Bisié, and, some interviews held in Bisié revealed that discords existed between FARDC brigades and even within brigades as to possible military interventions against miners. If the Authorities ordered the use of force against local miners for chasing them away⁶⁴, it could supposedly trigger disorganisation within the FARDC presence in the area and contribute to greater instability (for instance if soldiers were to desert or to refuse to obey the orders).

Despite potential for the above mentioned risks, artisanal miners now have opportunities for successful transitions to other sites. In early 2015, the Government together with the United Nations body JMAC/OIM (Joint Mission Analysis Cell of the International Organization for Migration) supported by USAID and other international organizations⁶⁵ validated 7 new official artisanal mining sites, which have been covered under the iTSCI programme since that time (March 2015)⁶⁶. Most of these sites have suffered during the past months of a lack of investment by négociants/exporters (see section II) but it is anticipated that the evacuation of Bisié minerals will help new significant investments to be carried out, and that many of the artisanal miners of Bisié will move to these validated sites. Interviews with cooperatives and négociants however underlined the need for opening other sites, either more accessible

⁵⁹ Mai-Mai Cheka are currently operating gold and diamond mines in the Walikale territory, reportedly mainly around the OSSO River.

⁶⁰ Threats of attacks by Cheka on 15/12/15 have been conveyed in Q4 2015, and triangulated by the evaluation team

⁶¹ Arrêté No-1/215/CAB/GP-NK/2014 by North Kivu Governor made artisanal mining activities in Bisié forbidden, and artisanal miners have refused to leave since then.

⁶² "NTAMBI YA NDUMA", which means "a wing of unity".

⁶³ This information was collected from the intelligence service (ANR).

⁶⁴ Idem

⁶⁵ Known as the *Mission de Validation*

⁶⁶ These new sites are Matamba, Camp Plaine, Camp Briques, Lubilinga, Amamokoa, Angisi and Bisagowa

or with more potential⁶⁷. All interviews with cooperatives' representatives carried out by the evaluation team indeed revealed that artisanal miners are not keen to move off-site under current conditions (no other sites opened than new surrounding iTSCI sites and no other livelihoods restoration programmes).

The Joint Mission Analysis have recently embarked on a new program to validate some of these alternate sites in the region where the artisanal miners can work, although many stakeholders have complained about the delays of the process. Bisié 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 although not contributing to the financing of subsequent traceability and due diligence programmes. The validation process is expected to be complete in Q1 of 2016, following successive delays, and may lead to the implementation of the iTSCI system if relevant financial support external to the upstream industry actors can be found ..

It is therefore crucial that Provincial and Territorial authorities **communicate with Bisié artisanal miners the opening of iTSCI sites and the schedule of the *mission de validation***, in order for them to be aware of these transition opportunities. The evaluation team strongly recommends to Provincial authorities that they undertake this communication locally, **in Manoiré**, so to allow all local miners to obtain complete and most recent information as to these new opportunities. A partial and remote communication (from Walikale) with cooperatives' representatives (who have local interests in Bisié) would not necessarily reach all miners satisfactorily.

⁶⁷ State agencies (SAESSCAM, DIVIMINES) and value chain actors have notably mentioned the following sites with good potential: Kaley Boeing, Kibabundo, Isangi, Ibando, Bukumo, Idanbo, Malembe, Ngumba, Midembi, Kabunga.

ANNEX A – Incidents reported by the on-the-ground assessment team

Incident summaries and updates are provided first to iTSCi member companies and normally after delay to the public. This allows for sufficient verification, updating on follow up actions, and in order to retain value of the information to those who are financially contributing to the iTSCi Programme. The summaries are available here; https://www.itri.co.uk/index.php?option=com_mtree&task=listcats&cat_id=198

Incident number	Category	Level	Place	Involved	Description	Mitigation measure	Status	Date	Date of closure
NK/2015 /0095	Security	2	Walikale town	Unidentified bandits, FARDC	In the night of 26-27 October, in Walikale town an FARDC munitions depot was attacked by unidentified bandits. An FARDC soldier was killed, and weapons including munitions boxes were stolen. The attack resulted in unrest by FARDC soldiers, protesting against the attack. On 30 October, two workers from NGO Concern were abducted on the Walikale-Goma road.	iTSCi staff advised all traders to temporarily stop mineral transports on the Walikale-Masisi axis; The incident to be discussed at the local and provincial level; iTSCi to closely follow-up on the security situation at the mine site and along the transport route	Open	29/10/15	
NK/2015 /0097	Security	2	Lubero; Butembo -Goma road	FDLR, FARDC, PMH, civil society	Several road attacks were reported on the Butembo-Goma road, and were allegedly committed, among others, by FDLR bandits. The rebels looted some busses, and stole value goods from the passengers. As a result, transporters went on strike to protest against the insecurity.	FARDC arrested six bandits and continue its operations against the rebel group. The concerned axis is not an iTSCi mineral transport route. iTSCi activities were therefore not affected.	Closed	30/10/15	30/10/15
NK/2015 /0102	Tagging	2	Njingala-Walikale road	iTSCi staff, PMH	176 stock tags were lost during transport by iTSCi staff on the Njingala-Walikale road.	iTSCi to check if these tags were used and to inform ITRI data team to cancel the tags.	Closed	10/11/15	20/04/16

NK/2015 /0105	Security	2	Bisie	COCABI cooperative, FARDC, PMH, PNC	Operations manager at COCABI cooperative was abducted in the night of 16-17 November by unidentified men in Bisie. This created a panic movement among miners who stopped working for one day. He was found the following day near Biruwe and seemed to have been tortured.	The victim was brought to FARDC base in Biruwe; then to the hospital in Mubi. FARDC launched investigations. iTSCi to follow up on the investigations.	Closed	18/11/15	28/04/16
NK/2015 /0106	Tagging	2	Goma	HTC	In July, HTC exported eight tonnes of minerals which were obtained after processing the tailings of the Bisie stock. The minerals were exported untagged with a Certificate of Origin delivered by CEEC.	iTSCi collected all relevant documents related to the export; HTC to explain how they will undertake their due diligence for the exported lot.	Open	20/11/15	
NK/2015 /0110	Human rights	3	Between Bisie and Ndjingala	Porter	A porter was sick and collapsed on the way from Bisie to Ndjingala; another porter transported his mineral bag, while the sick porter was brought to an health centre.	The mineral owner was informed and sent another porter to transport the mineral bag to Ndjingala. The sick porter was brought to the hospital in Biruwe.	Closed	10/11/15	10/11/15
NK/2015 /0111	Tagging	3	Bisie	Negociant, SAESSCAM	When the negociant and the SAESSCAM agents wanted to put the mine (stock) tag, 11 bags were missing among the 450 bags which had been previously recorded on the mine logbook sheets. The 11 mine tags were handed over to SAESSCAM Chief in Bisie, pending the negociant to find the missing bags.	The tagged bags were transported to Ndjingala and will be stored there pending the negociant to find the missing 11 bags.	Closed	10/11/15	04/12/15

NK/2015 /0112	Tagging	3	Between Bisie and Ndjingala	Negociant	A stock tag broke during transport from Bisie to Ndjingala; the porter, who was not aware of the importance of the tag, did not pick it up. PMH and Divimines were informed about the incident. Upon arrival in Ndjingala, the bags were weighed again. iTSCi staff found out that the missing tag had the number 0550606.	An official record to be recorded and annexed to the mine logbook sheet; Negociants, government agents and iTSCi to raise awareness of porters about the iTSCi system and the necessity to pay attention to the tags.	Open	10/11/15	
NK/2015 /0113	Tagging	3	Bisie	SAESSCAM	A SAESSCAM agent forgot to record and tag one bag out of the 142 bags declared by a negotiant.	After being informed, the SAESSCAM agent tagged the omitted bag and recorded it on logbook sheet 0064696.	Closed	16/11/15	16/11/15
NK/2015 /0114	Tagging	3	Bisie	SAESSCAM, iTSCi	A SAESSCAM agent noticed that one (empty) sheet no. 0064554 was missing in the mine logbook sheet.	The mine logbook sheet was cancelled. An official record was drafted.	Closed	18/11/15	18/11/15
NK/2015 /0115	Tagging	2	Kisangani	ANR	In Kisangani, ANR agents are collecting illegal tax from vehicles transporting minerals (Bisie stock). CLS members wrote a letter to the Provincial Minister of Mines and the Provincial Governor to denounce the abuses and call for actions.	iTSCi to follow up on the reaction of the Provincial authorities; the incident to be discussed at the next CPP meeting.	Closed	25/11/15	28/04/16
NK/2015 /0116	Tagging	3	Mubi-Walikale road	Mineral transporter, ANEMNKI, PMH	A truck transporting 10 tonnes of Bisie stock was involved in a road accident, as the driver was allegedly drunk. Two mine tags were broken but found at the site of the accident; one bag was lost.	iTSCi to check all bags of the negotiants upon arrival at the processor in Goma to find out which tag is missing. An official record to be drafted. Sanctions to be taken against the driver.	Open	27/11/15	

NK/2015 /0123	Security	1	Bisié - N'jingala	FARDC & porters	<p>According to observations made by iTSCI staff and corroborated by representatives of the civil society in Walikale, FARDC are illegally collecting taxes on the Bisie-Ndjingala path.</p> <p>The illegal tax collection takes place at four barriers:</p> <ul style="list-style-type: none"> • At Njingala: 500FC (0.53\$) per person passing by the barrier. At this barrier, the following security services are present: DGM (Migration Department), ANR (intelligence service), and a representative of the territory as well at FARDC 84th Sector. According to information collected by iTSCI in Walikale, the tax is allegedly divided among all these services; although the actors involved denied it. A fixed tax on goods transported is also perceived by the sector (administrative entity). • At Musheba: FARDC perceive 500 FC per person • At Mafilifili: FARDC perceive 500 FC per person; a representative of the territory is also present; • At Bisie: FARDC perceive 200 FC (0.2\$) per person; traditional authorities also perceive two taxes: 500 FC per person on a fixed tax on 	iTSCI to inform the Provincial Minister of Mines about the incident and to discuss actions against the illegal tax collection. The CLS signed an official letter mentioning that they the deployment of security forces had been agreed by all stakeholders but recognising that the tax was illegal. They committed to more transparency in the future when it comes to the deployment of state security forces.	Closed	15/12/15	28/04/16
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				<p>goods transported (as tax on mineral's display).</p> <p>N.B. The taxes collected by the sector are legal.</p> <p>According to information received by iTSCI field staff, there is no longer any barrier at Musheba since 5 December 2015. As a result, no tax is collected anymore at this point. The reasons why this barrier does not exist anymore remain unclear. There is some confusion as whether this barrier was also part of the agreement between economic operators and FARDC mentioned below.</p> <p>The taxes perceived by FARDC dates from 2012, at a time when economic actors in Bisie and Manoiré (including stakeholders involved in mining, but also retailers working in Manoiré) were sometimes looted by armed people on the Bisie-Njingala track and therefore asked FARDC to secure the path. FARDC were subsequently deployed between Bisie and Njingala in order to maintain security of porters against armed groups or bandits. This structure has remained until today.</p> <p>All local stakeholders interviewed during 11-17 November 2015 (negociants, cooperatives, and porters) seemed to agree to pay these taxes, which should enable soldiers to buy</p>			
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					<p>foods; as the government is not always able to regularly pay all soldiers.</p> <p>However, it should be highlighted that no receipt is delivered. Moreover, there is no legal basis for the taxes perceived by FARDC. There is no signed agreement between FARDC and economic operators; the agreement was merely verbal. The FARDC soldiers are armed and present at the barriers.</p> <p>Since the beginning of the transport of Bisie stocks, no violations of human rights by FARDC were reported.</p>				
NK/2015 /0134	Tagging	3	Goma	LEON MUZISHAMBA (negociant),	<p>On 4 December 2015, Bakulira received minerals from Bisie. Instead of 27 bags, as recorded on the mine logbook sheet 0062745 and on the mineral transport authorisation, only 26 bags were delivered.</p> <p>Mineral bag with mine tag no. 0553131 (50 kg) was missing.</p> <p>The transporter and negociant were interrogated but could not provide any explanations. According to them, there was no incident during transport; but the bag could allegedly have fell off the car due to the bad road condition.</p>	<p>iTSCi to follow up on the investigations;</p> <p>The negociant to look for the bag;</p> <p>An official record to be drafted.</p>	Open	09/12	

NK/2016 /0035	Security	3	Biruwe	SAKIMA, SAESSCAM, PMH, FARDC	Allegations that minerals coming from Biruwe (a locality in the West of the Walikale territory) were smuggled to Maniema, where they are sold at a higher price. FARDC are allegedly involved in the fraud.	A commission comprising SAESSCAM, PMH and SAKIMA launched investigations; iTSCI to collect information from the investigations. iTSCI to identify the potential mine sites from which minerals were smuggled.	Open	13/04/16	
NK/2016 /0046	Tagging	3	Bisié	HTC, Metachem	Among the residual stock minerals from Bisie that were tagged, there were 3,000 kg reportedly produced in 2010 and 16,800 kg in 2011; i.e. during the official presidential suspension or at a time when FARDC or NDC Sheka were controlling the site. For these dates, the risks of illegal tax collection are high.	3,000 kg were transported to HTC and segregated; the 16,800 kg will be also segregated upon reception at Metachem.	Open	29/04/20 16	

ANNEX B – Alphamin non-objection letter

MINING AND PROCESSING CONGO SARL

MPC/ALPHAMIN BISIE MINING SA
172/10, Avenue du Lac, Quartier Himbi
Commune de Goma

N/Réf : RC/2015/008

Objet : Réponse au sujet des stocks

Goma, le 27 avril 2015

07-31

A Son Excellence Monsieur le Ministre Provincial
des Mines du Nord-Kivu
à Goma

Goma, le 27 avril 2015

A Son Excellence Monsieur le Ministre Provincial des Mines

A Goma/Nord- Kivu

C.I : - Excellence Monsieur le Gouverneur de Province

- PACT/ITRI
- USAID
- BGR

Excellence,

Nous venons, par la présente, donner suite à la question "des minerais " se trouvant à Bisie.

L'exploitation minière artisanale ne faisant pas partie de nos prérogatives ; notre société a du mal se reconnaître une quelconque autorité ni compétence à décider de la suite à donner aux présumés stocks se trouvant sur place.

Comme vous le savez, les services des mines (SAESSCAM, Antenne des Mines, etc.) ainsi que les organisations privées du secteur pourront, sans nul doute, donner une suite à cette question et trouver une solution déterminante.

Notre société voudrait bien savoir exactement la hauteur de l'assistance que le Ministère attend d'elle tant il est vrai que nous ne possédons pas l'expertise ni l'autorité dans le mécanisme et la gestion des minerais de production artisanale.

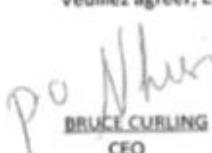
Nous osons croire que les institutions et organisations qui nous lisent en copient sont les mieux indiquées dans cette approche.

MINING AND PROCESSING CONGO SARL

Nous signalons également qu'à ce jour, notre société n'a reçu, de la part des instances compétentes, aucune correspondance relative à la question d'évacuation des stocks se trouvant à Bisie ; vous avez néanmoins notre assurance de non-objection le cas échéant.

Nous vous réaffirmons, Excellence, notre disponibilité à assister votre Ministère dans des questions découlant de notre expertise et compétence au ce sujet.

Veuillez agréer, Excellence Monsieur le Ministre, l'expression de profond respect.


BRUCE CURLING
CEO

ANNEX C – Stock inventory

NAME & ADDRESS DE L'EMP.	N° CARTE	N° OCCIT	WTN kg	DIS
JEANNEAU JEANNE	-	30	1.500 kg	
LEONARD J. LEONARD	-	20	1.400 kg	
LEONARD J. LEONARD	-	200	35.000 kg	
LEONARD J. LEONARD	-	280	10.000 kg	
LEONARD J. LEONARD	000677	600	30.000 kg - 10.000	
LEONARD J. LEONARD	-	140	2.000 kg	
LEONARD J. LEONARD	-	120	6.000 kg - 10.000	
LEONARD J. LEONARD	-	200	10.000 kg	
LEONARD J. LEONARD	-	210	40.000 kg - 10.000 (CARTE)	
LEONARD J. LEONARD	-	650	32.000 kg	
LEONARD J. LEONARD	-	250	35.000 kg - 10.000	
LEONARD J. LEONARD	-	700	35.000 kg	
LEONARD J. LEONARD	-	140	2.000 kg	
CHIRAMBOU GENEVIEVE MARYLINE	-	300	15.000 kg	
PASCAL CHIRAMBOU	-	600	30.000 kg - 10.000	
NOIR DANTHINE	-	80	1.000 kg	
CATHARINE DANTHINE	-	80	4.000 kg	
CECILIE DANTHINE BARSE	-	80	4.000 kg	
LOUIS DANTHINE	-	1.100 kg	15.000 kg	
ELIE DANTHINE	-	300	15.000 kg - 10.000	
KACKE BAWANGA	-	2.200 kg	10.000 kg	
KACKE BAWANGA	-	40	2.000 kg	
KACKE BAWANGA	-	400	2.000 kg	

NAME & ADDRESS DE L'EMP.				
LEONARD J. LEONARD	-	100	5.000 kg	
LEONARD J. LEONARD	-	220	6.000 kg	
LEONARD J. LEONARD	-	100	1.000 kg	
LEONARD J. LEONARD	-	220	15.000 kg	
LEONARD J. LEONARD	-	50	2.000 kg	
LEONARD J. LEONARD	-	60	3.000 kg	
LEONARD J. LEONARD	-	150 kg	7.000 kg	
LEONARD J. LEONARD	-	60	3.000 kg	
LEONARD J. LEONARD	-	20	1.000 kg	
LEONARD J. LEONARD	-	220	15.000 kg	
<u>TOT GENERAL</u>		28.000 kg	1.368.050 kg = 1.368.05 Tonnes	
			Xxx dans un rapport fait en octobre 2015 Colis fait en million tonnes septembre 2015 Cent kilogrammes	
			Salut à tous, le 05 jan. 2015. Le chef d'antenne des mines de Dakar, Sénégal	
			Dakar, Sénégal	
			Naoum TRAHIBA SENE	

ANNEC D – Minutes of the meeting held during the 8th OECD-UN-ICGLR forum

Minutes of the Meeting of Exchange views on Minerals stocks that are not eligible to the ICGLR Certificate.

I. INTRODUCTION

On the sidelines of the 8th tripartite forum ICGLR-OECD-GECNU, a short meeting was held on November 5, 2014 in the hall of the Hotel du Fleuve in Kinshasa, on the issues of residuals stocks of untagged minerals.

II. PARTICIPANTS

a) Government OF D R CONGO

- H E Jean Ruyange, Ministre Provincial du Nord Kivu en charge des mines
- Mabolia Yenga, Coordonnateur Promines
- Thierry Sikumbili, Chef d'antenne du CEEC/Bukavu
- Emmanuel Ndimubanzi, Chef de Division Provinciale des Mines et Géologies du Nord Kivu

b) US STATE DEPARTMENT

- Mme Eileen Kane, Chargée des Minéraux des conflits et du Processus de Kimberley au Dpt d'Etat Américain.

Wolikale
Gwakpala!

c) OECD

- Mr. Tyler Gillard, Directeur, Projets sectoriels, Unités sur la conduite responsable des entreprises
- Mr Louis Marechal, Conseiller politique, Industries, Extractives, Unités sur la conduite responsable des entreprises OCDE.

d) From THE BUYERS

- Mr Ulric Schwela, Technical officer, Tantalum-Niobium International Study Center
- Mr Antonio Hernandes Iaviaides, chargé de la Politique régulatoire d'implémentation de INTL FC Stone
- Mr Michael Rohwer, Directeur de Programme, Conflict free sourcing Initiative

e) FOR ITRI

- Mme Kay Nimimo, Responsable pour les affaires réglementaires et de durabilité, ITRI Ltd

f) FOR ITRI/PACT

- Mr Yves Bawa, Directeur du Programme Régional de l'ITSCI, PACT Inc

g) For BGR

- Pr Balfour Berume, Ingénieur Senior, BGR

h) For FEC/Mines

- Mr John Kenyon, Vice-président de la chambre des Mines Fédération des entreprises du Congo

III. CONDUCT OF THE MEETING

From the outset, and as he had done in the 7th Forum of May in Paris, and also in his presentation at this 8th Forum, the Provincial Minister of North Kivu in charge of mines reiterated the concern of Provincial Government of North Kivu to see an option exercised on the fate of untagged minerals, because you cannot destroy them, or keep them indefinitely.

B. A. B.
U. M.
B. A. B.
T. V.
F. P.
A. H.

1) Wakaleko
3) Validation des sites

These stocks are in 3 categories:

1. Coltan extracted from (Green) sites of Rubaya, before requalification and therefore not labeled(52 tons)
2. cassiterite from Wailkale unskilled sites
3. batch bearing no tags (temp)

After discussion, it was proposed that it be granted 60 days to clear all stocks, including those on the sites.

This period shall commence on a date to be fixed by the Government of the Democratic Republic of Congo.

The Exporters will buy these minerals, which will be labeled with tags at the (tags Depot), Green depot, based on the documentation accompanying each consignment to evaluate the risks and will find themselves takers.

Since they do not qualify to be exported under ICGLR certificates, these products will be exported with the traditional mining certificate. For this a special exemption from the Belgian Minister of Mineral Resources.

In order to help build credibility and trust around this process, some conditions would need to be respected, namely:

- a clear public commitment at the outset (with follow-up enforcement measures described therein) whereby after this one-time only exemption, the Government will not provide any further exemptions for stocks, and that any trader or exporter will, at any point, have to demonstrate a minimum due diligence in line with the OECD Guidance on minerals and the ICG-R RCM in possession, or else the material it holds will be confiscated/seized by the government.

The minimum due diligence would consist of:

- the trader/exporter has undergone the compulsory due diligence training organized by the DRCMinR SoM and has obtained a certificate of competency, however
- the trader/exporter has a written assessment of the risk of contamination of the mineral being traded, and has taken appropriate steps to mitigate such risk
- the trader/exporter has a written declaration of the quality of the mineral being traded.

Management of the exemption period:

- In preparation of the 60 days exemption period, the government could allow all owners of such stocks to declare them and report to public authorities within a one-week period.
- It would have to be clear that stocks covered by the exemption could only consist of above ground, pre-existing stocks. The government would therefore need to ensure that during the exemption period, no additional unchecked production is added to the pre-existing stocks.
- A one-week temporary ban on production from sites neighboring stocking facilities could be considered during or prior to the declaration period to prevent any contamination.

Q X M Uduv 48. 18th of Sept
T - G A. Nels
W

• Furthermore, a process could be considered whereby if any direct evidence is found that actually links the so-called "stocks" to a non-state armed group or to the abuse of human rights, it would be seized by the government.

in preparation for the exemption period, the government of the DRC would have to mobilize reinforcements to support local staff of the Police des Mines and other involved governmental agencies.

Comment (MLB)
Done in Kinshasa, November 6, 2014
Emmanuel Ndimubanzi

Translate from French to English

By Mabola

Perry
RUYANDZE DEPART
Prof. Dr. Bemba

Done in Kinshasa, November 6, 2014

Emmanuel Ndimubanzi

Jean-Pierre
MUNGUZA
Yves BRAIS

Signature
Chef d'Etat-major
confidentiel

Véalis
KAMINONO

CDR
UDAC SOMA

Ellen Helen Kaus
U.S. Dept of State
Deputy Envoy
Whitehall Workplace

John
NANTYONI

Tyler
GILLARD
OECD

Antonio
HERNANDEZ
INTL FC STONE

Louis
DAHIECHAL
OECD

ANNEX E – Authorisation of stock evacuation by the National Minister of Mines

République Démocratique du Congo



MINISTÈRE DES MINES

Le Ministre

03 JUIL 2015

064


Kinshasa, le 26 JUN 2015

N/Réf : CAB.MIN/MIINES/01/054/2015

Transmis copie pour information à :

- Son Excellence Monsieur le Premier Ministre, Chef du Gouvernement (*Avec l'assurance de ma haute considération*)
C/o Hôtel du Gouvernement
- Son Excellence Monsieur le Vice-Premier Ministre, Ministre de l'Intérieur et Sécurité,
- Son Excellence Monsieur le Vice-Premier Ministre, Ministre de PT & NTIC
- Monsieur le Ministre des Affaires Etrangères et Coopération Internationale
- Monsieur le Ministre de l'Economie Nationale
- Madame la Ministre du Commerce extérieur
- Monsieur le Secrétaire Général des Mines
- Monsieur le Directeur Général du CEEC
- Monsieur le Coordonnateur Général du SAESSCAM
- Monsieur le Coordonnateur National de la CIRGL/RDC
(Tous) à Kinshasa/Gombe
- Monsieur le Secrétaire Exécutif de la CIRGL
à Bujumbura
- Madame Manager Director de l'ITRI
à Londres
- Monsieur Tyler Gillard
Head of sector Projects Responsable
Business conduct (RDC),
Investment Division, Direct
à Paris/France
- Monsieur le Ministre Provincial en charge des Mines
- Monsieur le Secrétaire Exécutif du Gouvernement Provincial du Nord-Kivu
- Monsieur le Chef de Division provinciale des Mines et Géologie
- Monsieur le Directeur Provincial du CEEC/Nord-Kivu
- Monsieur le Chef d'Antenne du SAESSCAM/Nord-Kivu
(Tous) à GOMA



Page 2 de notre lettre n° CAB.MIN/MINES/01/1054/2015

Demande d'une dérogation spéciale pour exportation des stocks résiduels
Accusé de réception

A Monsieur le Gouverneur de la Province du Nord-Kivu à Goma

Monsieur le Gouverneur,

J'ai reçu la lettre référencée n°0261/CAB/MINIPRO/RHEMH/PME/NK/2014 du 19 novembre 2014 m'adressée par le Ministre provincial en charge des Mines relative à l'objet repris en marge, par laquelle il me transmet le compte-rendu de la réunion restreinte tenue à Kinshasa, le 05 novembre 2014, en marge du 8^{me} Forum tripartite CIRGL-OCDE-GE/NU, sur la problématique des stocks résiduels des minerais non étiquetés et ai pris bonne note de son contenu.

A la lecture du compte-rendu de cette réunion qui avait regroupé les Représentants du Gouvernement de la RDC, du Département d'Etat Américain, de l'OCDE, des acheteurs internationaux, de l'ITRI, de PACT/ITSCI, du BGR et de la chambre des Mines/FEC, j'avais constaté que ce document important n'était signé que par le rapporteur de la réunion, en l'occurrence le délégué du Gouvernement de la RDC.

A l'issue des discussions, il avait été proposé, « qu'il soit accordé un délai de 60 jours pour dégager tous les stocks, y compris ceux qui sont sur les sites (...) Etant donné qu'ils ne remplissent pas toutes les conditions pour être exportés sous certificat CIRGL, ces produits ne pourront l'être qu'avec le certificat d'origine. Pour cela, une dérogation spéciale de son Excellence Monsieur le Ministre des Mines sera demandée » fin de citation.

Pour ma part, compte tenu de l'importance de cette décision, j'avais estimé que ce compte-rendu devait être signé par tous les participants en vue de rassurer toutes les parties prenantes, particulièrement les acheteurs et négociants internationaux, les fondeurs et les consommateurs finaux. **Aujourd'hui, je me réjouis que tous les participants ont apposé leurs signatures sur ce compte-rendu, en marge des travaux du 9^{me} Forum CIRGL-OCDE-GE/NU à Paris, tenu du 04 au 06 mai 2015. J'en prends donc acte.**

Les stocks résiduels des minerais enregistrés et documentés de la Province du Nord-Kivu concernés par la mesure de dérogation sont :

- (1) 52 tonnes de Coltan non étiquetées extraites des sites qualifiés et validés « vert » de Rubaya en 2012 par Arrêté Ministériel n° 0188 du 23 mars 2012 et requalifié en 2014, par Arrêté Ministériel n° 0078 du 21 février 2014 ;
- (2) 56,67 tonnes de Cassitérite provenant des sites non qualifiés de Walikale et se trouvant dans les dépôts des Entités de traitement Huaying Compangy et AMR Mugote & Frères ;

Page 3 de notre lettre n° CAB.MIN/ MINES/017-0-5-4.../2015

3) 2,7 tonnes de Cassitérite et 4,48 tonnes de Coltan non étiquetés constitués des lots saisis pour tentative.

Général du CEEC de se déplacer lui-même à Goma pour superviser cette opération qui ne pourra être enclenchée que si les propriétaires des stocks résiduels, les Entités de traitement exportatrices et les destinataires, à savoir les acheteurs internationaux sont clairement identifiés et en règle avec le Ministère des Mines, l'Administration fiscale et la Province. Par dérogation spéciale, ces lots seront exportés par les Certificats d'origine signés par le Directeur Général lui-même.

Concernant les minerais saisis pour tentative de fraude, ceux-ci sont également autorisés à être exportés, mais à la seule condition d'avoir fait l'objet d'une procédure judiciaire en bonne et due forme, telle que décidée lors du 9^{me} Forum CIRGL-OCDE-GE/NU à Paris.

Dans ce cadre, dans tous les lots à exporter, il sera tout indiqué de joindre une copie du compte-rendu signé par toutes les parties prenantes à Paris et les ordonnances judiciaires, en ce qui concerne les minerais saisis.

Veuillez agréer, Monsieur le Gouverneur,
l'expression de mes sentiments distingués,

Martin KABWELULU

ANNEX F – Minutes of the technical meeting held in Goma

PROCES VERBAL DE LA REUNION TRAITANT SUR LES MESURES D'ACCOMPAGNEMENT DES STOCKS DES MINERAIS RESIDUELS A BISIE.

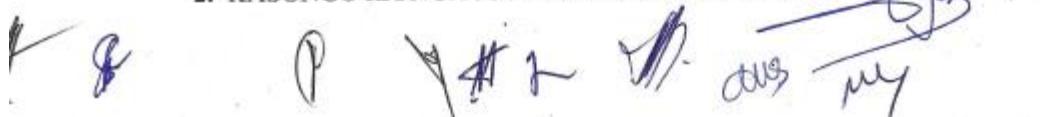
L'an deux mille quinze, le troisième jour du mois d'Août, nous, membres de la Commission Technique des mines, avons tenu une réunion de service dans la salle de réunion du CEEC à Goma, en rapport avec les mesures d'accompagnement d'évacuation des stocks des minerais résiduels de WALIKALE à Bisie.

Considérant les dispositions adoptées lors de la réunion présidée par le Directeur Général du CEEC du 17/07/2015 à l'Hôtel MBIZA sur les minerais de Bisie, les membres ici présents se sont fixés ce qui suit :

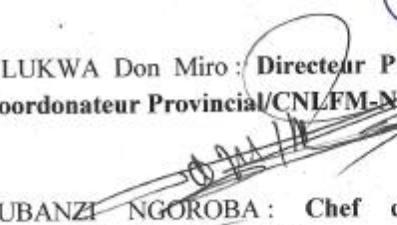
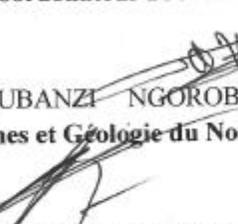
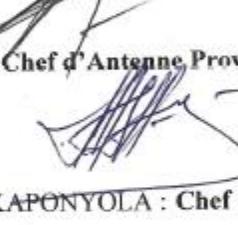
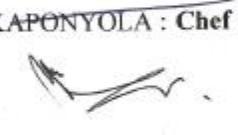
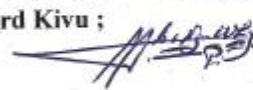
1. Les minerais seront emballés dans des colis de 25kgs à partir de Bisie ;
2. L'étiquetage à Bisie commence avec le premier stock des TAG STOCKS disponibles chez PACT/ITRI ;
3. La nécessité de PACT/ITRI de passer une autre commande pour étiqueter les lots restants ;
4. Pré affecter les ATM au niveau de Bisie qui devront accompagner les minerais jusqu'à Ndjingala ;
5. L'engagement de tous les partenaires et services impliqués de ne pas aller en dépassement des quantités réellement déclarées ;
6. Les minerais quitteront NDJINGALA avec une autre ATM pour Goma ;
7. Les séries d'étiquettes livrées à Bisie seront communiquées régulièrement à Goma via Internet ;
8. Le SAESSCAM mettra à la disposition des Négociants les numéros des comptes bancaires de tous les services impliqués à la taxation des minerais ;
9. La communication des numéros des séries des étiquettes disponible à couvrir tous les stocks retenus dans la déclaration du Gouvernement Provincial du Nord-Kivu ;
10. Les frais, taxes et impôts liés à la sortie des minerais de Bisie à Goma s'effectuera à Goma et les preuves parviendront par le biais de PACT/ITRI via internet ;

Pour les participants :

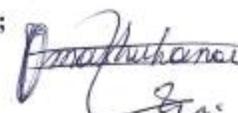
1. Jean RENZAHO : Conseiller du Ministre Provincial des Mines du Nord-Kivu ;
2. KASONGO ILUNGA JOSE : Chef de Division/CEEC ;



3. MURUHUKA BALEZI Aimé : Conseiller Juridique/CEEC ;

4. MUWAWA ILAY LUKWA Don Miro : Directeur Provincial du CEEC/N-Kivu et Coordonateur Provincial/CNLFM-Nord-Kivu ;

5. Emmanuel NDIMUBANZI NGOROBA : Chef de Division Provinciale des Mines et Géologie du Nord-Kivu.

6. Lemos MAREMO : Chef d'Antenne Provinciale du SAESSCAM/N-Kivu ;

7. Raphael MBOKO KAPONYOLA : Chef de Bureau Minier Isolé de Walikale ;

8. Désiré NZIWA MBALE : Inspecteur Mobile Provincial/SAESSCAM-Nord Kivu ;

9. Godet NDOOLE BYUMA : Chef de Bureau Provincial des Mines à la Division Provinciale des Mines et Géologie du Nord-Kivu ;

10. MWANZA MWAMBA Yvette : FEC/Mines Nord-Kivu

11. Justin UWEMA MASHUKANO : Chef de Projet Adjoint/PACT-ITSCI Nord Kivu ;


ANNEX G – Autorisation spéciale d'évacuation des minerais résiduels de Bisié

REPUBLIC OF CONGO
MINISTERE DES MINES

DIVISION PHYSIQUE DES MINES
ETABLISSEMENT

Le Chef de Division

NON TAXABLE

AUTORISATION SPECIALE D'EVACUATION DES MINERAIS RESIDUELS DE BISIE
N° DIVIMINES-GEO/35417.01.4/0.1015

Le 09/06/2015 à ASSANI

Membre de la Coopérative Minière : LOCABI

Fac. Autorisé (s) à évacuer le perte de 0500 kg stock au 01/06/2015 : 3000 kg de Cossatella amassée dans : 3000 kg. Nous déclarons : 3000 kg au total.

MOUVEMENT DE SORTIES

N° de Série	Quantité évacuée (kg)	Récepteur	N° de Colis	N° DOPM	VISAFESSCAM (Nom et Signature)	VISAFESSCAM (Nom et Signature)
01	40.000	700	38.300	14/06/3087	Justine MUNYOLERE	François BARUANI
02	-10-	3.300	32.000	16/06/3653	-10-	FIXIRI ISINGE
03	-10-	200	35.800	04/06/3686	-10-	FIXIRI ISINGE
04	-10-	7.100	38.300	18/06/3026	-10-	Justine MUNYOLERE
05	-10-	6.000	38.500	10/06/3676	-10-	Justine MUNYOLERE
06	-10-	3.000	19.200	10/06/3627	-10-	Justine MUNYOLERE
07	-10-	4.000	11.800	10/06/3628	-10-	Justine MUNYOLERE
08	-10-	3.000	10.700	10/06/3685	-10-	Justine MUNYOLERE
09						
10						
11						
12						
13						
14						

ANNEX H – Extension of the process and authorisation of evacuation by air by the National Minister of Mines



Kinshasa, le 21 DEC 2015

N° CAB.MIN/MINES/01/2016./2015

Transmis copie pour information à :

- Son Excellence Monsieur le Premier Ministre, Chef du Gouvernement
(Avec l'assurance de ma haute considération)
C/o Hôtel du Gouvernement
- Son Excellence Monsieur le Vice-Premier Ministre, Ministre de l'Intérieur et Sécurité
- Son Excellence Monsieur le Vice-Premier Ministre, Ministre des PT & NTIC et Président de l'ECOFIRE
- Monsieur le Ministre des Transports et Voies de Communication
- Monsieur le Secrétaire Général des Mines
- Monsieur le Directeur Général de la Régie des Voies Aériennes
- Monsieur le Directeur Général du CEEC
- Monsieur le Coordonnateur Général du SAESSCAM
à KINSHASA/GOMBE
- Honorable Président de l'Assemblée Provinciale du Nord-Kivu
- Monsieur le Vice-Gouverneur de la Province du Nord-Kivu
- Monsieur le Ministre Provincial en charge des Mines
- Monsieur le Chef de Division Provinciale des Mines et Géologie
- Monsieur le Chef d'Antenne Provinciale du SAESSCAM
(TOUS) à GOMA

A Monsieur le Gouverneur de Province du Nord-Kivu
à GOMA

Monsieur le Gouverneur,

J'accuse réception de votre lettre référencée n° 01/1639/CAB/GP-NK/2015 du 02 décembre 2015 relative à l'objet repris en marge dont le contenu a retenu ma particulière attention, et je vous en remercie.

Ministère des Mines
Le Ministre

Page 2 de notre lettre n° CAB.MIN/MINES/01.....2.0.1.6./2015

Y donnant suite, je suspends provisoirement ma décision relative à l'interdiction du transport aérien des minerais et j'accède à votre demande. Ainsi, j'autorise l'évacuation des stocks résiduels des minerais des sites miniers de Bisié et de Ndjingala, à partir de la piste de Kilambo jusqu'à l'Aéroport International de Goma en vue de leur exportation, et ce pour une période ne dépassant pas 60 jours ouvrables.

A cet effet, je vous rends personnellement responsable de cette opération. Il y a donc lieu de prendre toutes les dispositions utiles pour qu'aucun lot des minerais ne puisse être détourné vers l'extérieur sans passer par le CEEC en vue de leur exportation. Les Agents des Mines et du SAESSCAM doivent capter toutes les données statistiques des colis des minerais expédiés et reçus au niveau de la piste de Kilambo et de l'Aéroport International de Goma. Les cinq aéronefs à sélectionner doivent signer un acte d'engagement fixant leurs obligations vis-à-vis de la Province.

Quant à l'étiquetage et à l'évacuation de tous les stocks déclarés, l'opération est prorogée jusqu'au 31 décembre 2015. Dans ce cadre, je vous demande de veiller à ce qu'aucun exploitant artisanal ne puisse s'adonner aux activités d'exploitation dans les périmètres miniers appartenant à la Société Alphamin Bisié Mining et aux tiers. Ces instructions doivent être de stricte application.

Veuillez agréer, Monsieur le Gouverneur, l'expression de mes sentiments distingués.

Martin KABWELULU

ANNEX I – Letter from the CLS in Walikale

REPUBLIQUE DEMOCRATIQUE DU CONGO

PROVINCE DU NORD KIVU TERRITOIRE DE WALIKALE

DECLARATION DU COMITE LOCAL DE SUIVI DES ACTIVITES MINIERE EN TERRITOIRE DE WALIKALE – SITUATION SECURITAIRE ENTRE BISIE ET NDJINGALA

La situation sécuritaire entre Bisie et Ndjingala a longtemps été précaire, les opérateurs économiques faisant l'objet d'attaques régulières par des bandits ou groupes armés identifiés ou non-identifiés.

En février 2012, les FARDC reprenaient le contrôle du site de Bisie, lequel était entièrement contrôlé depuis plusieurs mois par le groupe armé des NDC Sheka. Malgré le rétablissement des forces publiques de sécurité au niveau du site de Bisie, la situation sécuritaire resta précaire sur le tronçon Bisie-Ndjingala. Marqué par un regain d'activités économiques à Bisie et dans le village de Manoiré - aussi bien d'un point de vue des activités minières que commerciales, telles que la vente de produits alimentaires et autres biens de première nécessité, le nombre de personnes acheminant leurs biens de Ndjingala à Bisie et vice-versa augmenta, représentant continuellement une cible potentielle pour les coupeurs de routes. Afin de trouver des solutions à ce problème et lutter contre de telles attaques, les opérateurs économiques de la région, dont les creuseurs, les porteurs, les négociants, et les coopératives miniers se sont concertés avec les autorités territoriales.

Il a ainsi été décidé, en mars 2012, de mandater les FARDC afin de sécuriser la route de transport Bisie-Ndjingala.

A cet égard, il a été décidé d'ériger quatre barrières ou point de contrôle le long de ce tronçon, comme suit :

- Au sortir de Ndjingala
- A Musheba, à quelque Kilomètre de Ndjingala
- Au Mafilifili, à environ mi-chemin entre Ndjingala et Bisie
- A l'entrée de Bisie

D'autres services étatiques étaient également postés à certaines de ces barrières :

- A Ndjingala se trouvent, en plus des FARDC, des représentants de l'ANR, du DGM et du Territoire ;
- A l'entrée de Bisie était également posté un représentant des autorités coutumières.

La présence des forces de sécurité avait ainsi pour but d'assurer la sécurité des personnes empruntant ce chemin et de prévenir toute attaque de groupes ou bandits armés ou de coupeurs de route.

A cet égard, toutes les parties prenantes ont accepté volontairement le versement de paiements aux soldats postés au niveau des barrières susmentionnés afin de couvrir leurs frais alimentaires :

- Au sortir de Ndjingala : 500Fc par personne
- A Musheba : 500Fc par personnes
- Au Mafilifili : 500Fc par personnes
- A l'Entrée de Bisie : 200 Fc par personne

Ces paiement, payés par toute personne empruntant le tronçon Bisie- Ndjingala, étaient directement versés aux soldats FARDC et ne bénéficiaient en aucun cas aux autres entités mentionnées ci-dessus. Suite à l'amélioration de la situation dans la zone, la barrière de Musheba a été supprimée le 5 décembre 2015.



Dans le futur, si de tels cas se présentaient, les membres du CLS ont décidé de faire preuve de plus de transparence. Avec le soutien d'ITSI, le CLS s'engage à développer un protocole d'accord clarifiant les mesures à respecter au futur. Ainsi si des cas d'insécurité sont notés sur les routes de transport, les membres du CLS se réuniront et décideront

- a. de la nécessité de déployer ou non des forces de sécurité publiques (FARD/PNC/PMH) ;
- b. De leur mandat exact de sécurisation des biens et des personnes tout en respectant les droits de l'homme ;
- c. Si des versements sont effectués aux membres de sécurité pour services rendus, alors ceux-ci seront effectués de manière transparente. Toute décision de la sorte sera par un Procès signé par tous les membres du CLS présents, en ligne avec les lignes directrices de l'OCDE et des Principes volontaires.

Fait à Walikale, le 13.../04.../ 2015

LES MEMBRES DU CLS PRESENTS A LA REUNION



1. Territoire :



2. Bureau des Mines :

Raphael NBEKO
C.B./Bwana

3. ANR

4. SAESSCAM

5. POLICE des Mines

6. ITSCI

7. INTERMINES

8. ANEMNKI

9. ALPHAMIN

10. SECTEUR DES BAKANO

11. SECTEUR DES WANANGA

12. CEMIKA



13. SAKIMA



14. DGR-NK


Ainsi Simoing.

15. SECTEUR DES WANANGA

16. SECTEUR FARDC



17. TD FARDC


3
BAWA,

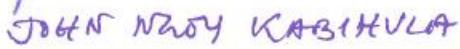
18. SOCIETE CIVILE

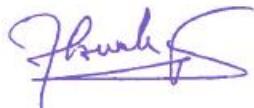


19. COMIMPA



20. CACABI


JOHN NDOY KABITULU



21. COMIDER



ANNEX J - Official report on March 2015 incident

REPUBLIQUE DEMOCRATIQUE DU CONGO
MINISTRE DE L'INTERIEUR, SECURITE,
DECENTRALISATION, ORDRE PUBLIQUE
ET AFFAIRES COUTUMIERES
PROVINCE DU NORD – KIVU

Walikale, le 10 Mars 2015



TERRITOIRE DE WALIKALE
Bureau de L'Administrateur

N° 5072/086/TW/16/2015

Objet : Rapport des événements
Survenus à BISIE du 04 au 07 Mars 2015

A son Excellence Monsieur le Gouverneur
de la province du Nord Kivu à Goma

Excellence Monsieur le Gouverneur,

J'ai l'honneur de vous faire parvenir le rapport de la situation qui avait prévalu à Bisie pendant la période allant du 04 au 07 mars 2015.

Il convient de signaler qu'en date du 04 Mars 2015, la société MPC avait amorcé les travaux sur le chantier 45 minutes qui était considéré par les artisanaux comme leur lieu d'exploitation ; chose qui avait soulevé ces derniers les poussant ainsi en date du 04 Mars 2015 d'organiser un groupe des mamans sous la conduite de madame SAKINA considérée comme bouclier humain.

En date du 06 Mars 2015, ce même groupe constitué de 8 mamans soutenues par 35 artisanaux issus de 03 coopératives locales dont la COMIMPA, COCABI et COMIDER qui avaient comme objectif d'empêcher la continuité des travaux entrepris par MPC sur ce chantier environ 16h 30 heure locale, la colonne avait suivi la direction de MPAMA 45 quelques temps après, des tirs à l'arme ont étaient entendus avec objectif d'empêcher ce groupe d'atteindre les installations du MPC. C'est maintenant que les

policiers de mine auraient récupérer une arme AKA 47 N° 0697 avec deux balles et autres armes (2 UZI et 2 Calibre 12) qu'utilisaient les artisanaux selon les informations du MPC et la police des mines de la place.

En date du 07 Mars 2015 ; les commerçants de la place sont venus pour récupérer leurs biens qui étaient alors protégés par la police des mines après la débandade des artisanaux.

Après l'analyse de la situation par le comité local de sécurité (BISIE), sur place il avait été obligé de procéder à l'exécution du message N° 686 du 29 Aout 2014 émanant du gouverneur de la province qui avait comme objectif de déguerpir sans condition les artisanaux inciviques dans le site de BISIE. Au cours de l'exécution de cet ordre, une rumeur faisait état d'un cas de viol perpétré sur une maman en la personne de SAFARI Tantine et des pillages. Après enquête menée par le comité local de sécurité à ce sujet, il s'est avéré que cette rumeur était fausse et d'ailleurs, la présumée victime de ce cas de viol cherche comment atteindre le parquet afin de porter plainte contre toute personne qui vivifierait cette rumeur.

En date du 08 Mars 2015, j'ai été interpellée par la situation qui prévaut à BISIE, de ce fait, j'ai été obligée d'y atterrir pour m'enquérir de la situation réelle.

Pour ce faire, après des entretiens séparés avec les acteurs principaux de ce conflit interminable notamment les artisanaux, la société MPC, les propriétaires de terres et les membres du comité local de sécurité, ces dernier ont chacun en ce qui lui concerne, formulé des recommandations auprès de l'autorité tant territoriale, provinciale que nationale en vue de trouver des voies de sortie de cette crise interminable :

I. POUR LE COMITE LOCAL DE SECURITE DE BISIE

- Départager les deux parties en conflit dont les artisanaux d'une part et la société MPC de l'autre part.
- Renforcer le dispositif sécuritaire présent à BISIE afin de le rendre capable de faire face aux éventuels troubles.
- Permettre l'évacuation des produits miniers en attendant les décisions hiérarchiques de validation et de qualification des sites.

II. POUR LES ARTISANAUX

- Respect des limites des champs d'exploitation établies entre les artisanaux la société MPC.
- Le respect de la ZEA (9 carrés) et la détermination du PR 5266 selon l'esprit du protocole d'accord conclu entre les artisanaux et la société MPC en 2010.
- La validation des sites en territoire de Walikale
- La permutation de tous les agents étatiques œuvrant à BISIE.
- La sécurité et le respect des droits des artisanaux.
- La libération de 5 artisanaux arrêtés par la police des mines de BISIE lors de ces événements.

III. POUR LES PROPRIETAIRES DES TERRES

- Le respect des détenteurs des terres par les artisanaux.
- Discuter pour le cahier de charge avec la société MPC avant sa signature conjointe.
- L'implication de l'autorité Provinciale de l'état pour départager la société MPC avec les artisanaux.

IV. POUR LA SOCIETE MPC

- Que le gouvernement veille sur le sort des artisanaux pour faire respecter les droits de tout un chacun entre MPC et les artisanaux.
- La restauration effective de l'autorité de l'état à BISIE pour lutter contre l'impunité et autres irrégularités.
- Qu'une enquête participante des autorités territoriales soit diligentée à BISIE pour déterminer les responsabilités des uns et des autres au sujet des ces crises à répétition.

Pour terminer ce rapport et après avoir mûrement réfléchi sur cette crise, permettez Excellence de vous suggérer de la manière suivante afin de répondre aux aspirations de la base :

1. La validation, la qualification et la certification des sites serait parmi les voies de sauver cette situation qui prévaut au quotidien à BISIE et baisser la tension dans la région
2. Une enquête participante à BISIE pour mettre fin aux différentes violations à répétition.
3. La signature des accords de toutes les parties impliquées serait aussi parmi les atouts dans la recherche de la solution aux problèmes de BISIE.

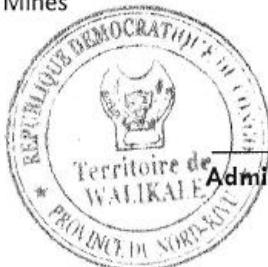
Veuillez agréer Excellence Monsieur le Gouverneur,
l'expression de ma très haute considération.

CC :

- Son Excellence MINATOPACRE NK
- / Son Excellence Ministre MINIPRO Mines
NK
(TOUS) à GOMA.

Fait à WALIKALE, Le 10 Mars 2015

Marie Claire BANGWENE MWAVITA



Administrateur du Territoire de WALIKALE

Chef de Division

ANNEX K – List of interviews held by the assessment team

Date	Location	Position
14/12/2015	Goma	iTSCI Project Manager for North Kivu
14/12/2015	Goma	iTSCI Deputy Project Manager
14/12/2015	Goma	Ministre Provincial en charge des Mines
15/12/2015	Goma	President of ANEMNKI
15/12/2015	Goma	General Manager - AMUR
15/12/2015	Goma	Due diligence Manager - Metachem
15/12/2015	Goma	Alphamin coordinator
16/12/2015	Goma	Coordinator of Bisie cooperatives
17/12/2015	Goma	President of the Federation des Exportateurs Congolais
18/12/2015	Bisie	iTSCI coordinator for Bisie
18/12/2015	Bisie	Alphamin security coordinator
18/12/2015	Bisie	Head of COCABI in Bisie
18/12/2015	Bisie	Head of COMIMPA in Bisie
18/12/2015	Bisie	Head of COMIDER in Bisie
21/12/2015	Walikale	iTSCI technician
21/12/2015	Walikale	iTSCI coordinator for Walikale
21/12/2015	Walikale	Territory administrator
21/12/2015	Walikale	MONUSCO representative
21/12/2015	Walikale	Civil society representative
21/12/2015	Mubi	SAESSCAM cordinator for Walikale
21/12/2015	Mubi	Commander PMH
22/12/2015	Njingala	Local administrator (chef de centre)
22/12/2015	Njingala	Deputy-commander PMH
22/12/2015	Njingala	Divimines agent
22/12/2015	Njingala	SAESSCAM agent
22/12/2015	Njingala	Negociant
22/12/2015	Matamba	Manager for COMIDEI