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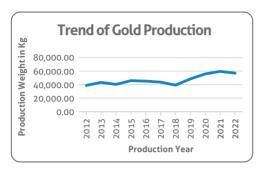
Abstract

Tanzania's gold and precious metals ore sector plays a pivotal role in the country's economy and community livelihood, yet it faces significant challenges in revenue collection. This policy paper examines the sector's intricate landscape of revenue collection risks, employing a comprehensive methodology that includes data analysis, case studies, and risk assessment frameworks. This analysis consolidates insights from literature, government documents, media reporting, and stakeholder interviews. It seeks to comprehensively understand illicit mining's multifaceted nature in Tanzania and its persistent existence. Various risks, such as illicit mining, including its trends and patterns and underreporting, are identified, and regulatory loopholes are identified and discussed, too. The paper also assesses the impact of these risks on Tanzania's economy and government revenue, highlighting the need for policy interventions. However, scholarly attention regarding the prevalence and impact of illicit mining in Tanzania's gold and metal sectors remains limited. Practical recommendations are proposed to address these challenges, offering actionable steps for policymakers, regulators, and industry stakeholders. By navigating the shadows of revenue collection risks, Tanzania can unlock the full potential of its gold and precious metals ore sector, ensuring sustainable economic growth and development.

1.0. Introduction

Tanzania has a rich mineral landscape with great potential. Its treasures include the famous Tanzanite gemstone and many gold deposits. (Rasmus Hundsbæk, 2019). However, despite this abundance, the mineral sector's contribution to national economic growth and community advancement falls short of expectations when compared with other sectors of the economy (Fitsum S. Weldegiorgis, 2021). The discrepancy is notably attributed to revenue leakages stemming from illicit mining practices, encompassing tax evasion, underreporting, illegal extraction activities, and cross-border smuggling of these invaluable resources.

Over time, Tanzania's mining sector has undergone persistent reforms to foster broader societal benefits by fortifying revenue collection and control mechanisms.



Positioned as a cornerstone within Tanzania's economic landscape, the gold and precious metals ore sector stands as a pivotal driver of export revenue and employment opportunities (Singogo, 2021). Notably, recent data illustrates a notable upsurge in the sector's significance, with its contribution to the GDP

climbing from 7.3 per cent in 2021 to 9.1 per cent in 2022. Moreover, mineral exports surged to USD 3,395.3 million in 2022, predominantly propelled by heightened gold exports (Ministry of Finance, August 2023).

Despite this growth, illicit mining activities cast a shadow over Tanzania's gold and metal sectors, prompting a need for a thorough investigation. The Government of Tanzania (GoT) initiated sector reforms in 2017 to combat these illicit activities, including tax evasion, corruption, and smuggling. In 2017, the Written Laws (Miscellaneous Amendments) Act 2017 was enacted, bringing significant amendments to the Mining Act of 2010 in Tanzania. These amendments were multifaceted, encompassing revisions to regulations concerning raw mineral storage, transportation, and beneficiation processes, as well as adjustments to royalty rates and the government's stake in mineral rights holders.¹

A notable aspect of these amendments is the stringent regulations imposed on the beneficiation and exportation of raw minerals. Under the Permanent Sovereignty Act and the amended Mining Act, mining companies are prohibited from exporting raw minerals for processing outside Tanzania. Instead, they are mandated to establish beneficiation facilities within Tanzania.²

Furthermore, upon extraction, raw minerals must be securely stored and subsequently transferred to the Government Minerals Warehouse within five days.

¹The Minig Act 2010 (R E 2019)

² The Natural Resource (Permanent Sovereignty) Act of 2017

Subsequent actions involving these minerals are subject to strict guidelines, allowing for their transfer to domestic processing plants, sale by authorised mineral dealers, or exportation only with prior authorisation from the government. These legislative changes were made with the main goal of reducing illegal mineral trading practices and bringing more transparency and accountability to Tanzania's mineral sector.

Moreover, measures such as establishing the Tanzania Mining Commission and Mineral Market centres were introduced to regulate licensing and mineral trading and reduce revenue leakages. Yet, smuggling persists despite revenue increases from established mineral markets.

The media fraternity has been actively covering incidents of smuggling.^{3,4,5} In addition to confusing statements from authorities, there are suggestions that minerals supposedly from Tanzania might be laundered before entering the global market.^{6,7,8,9}

While efforts have been made to enhance control measures, including establishing regulatory frameworks and security protocols, threats persist. For instance, allegations linking gemstones and gold smuggling to potential support for terrorist networks have drawn international attention, albeit lacking direct evidence. The 2001 tanzanite scandal, exposed by two Wall Street Journal reporters, suggested that al-Qaeda controlled a sizeable trade in tanzanite from Tanzania. (The United Republic of Tanzania, RE 2023)

In a bid to combat these challenges, the Tanzanian government, under the leadership of the late President John P. Magufuli, initiated assertive measures such as the construction of a protective wall around Tanzanite mining areas and the implementation of stringent regulations governing mining activities within these demarcated zones. These efforts underscore a commitment to bolstering security, managing mining operations effectively, and mitigating illicit conduct.

³ Eight traders arrested in Tanzania for smuggling gold-Xinhua (news.cn)

⁴ Smuggling claims could dent the Tanzanite trade | The Citizen

⁵ Rare \$120 million rough ruby from Tanzania unveiled in Dubai | The Citizen

SAKATA LA RUBY DUBAI: WAZIRI BITEKO AJIBU - "YAPO MENGINE 25, WATANZANIA WANA HAKI YA KUKASIRIKA" - YouTube

⁷ Record-breaking Tanzanian ruby exposed in Dubaï | Africanews

RUBY YA TANZANIA ILIYOONEKANA DUBAI IKIUZWA, SERIKALI YATOA MAJIBU BUNGENI - "MMILIKI NI MMAREKANI" - YouTube

⁹ Tanzania probes Sh8 billion gold seized in India | The Citizen

Given this context, our investigation aims to explore the complexities of these challenges, assess their consequences, and offer practical policy suggestions to address the intricate issues surrounding Tanzania's gold and precious metals ore industry. Through rigorous analysis and collaborative engagement, we aim to illuminate pathways toward sustainable development and equitable resource utilisation, safeguarding the nation's economic prosperity and social well-being.

While the GoT has implemented laws to curb smuggling and illicit trade, perceptions persist that these efforts have inadequately regulated the sector. This paper addresses this gap by consolidating insights from literature, governmental documents, media reporting, and stakeholder views. It seeks to comprehensively understand illicit mining's multifaceted nature in Tanzania and its persistent existence.

1.1. Objectives

- 1. Assess the prevalence and extent of illicit mining activities in Tanzania's gold and precious metal sectors.
- 2. Examine the efficacy of the existing legal framework in curbing illicit mining practices.
- 3. Analyse the interdependence between formal and informal institutions in influencing mining activities.
- 4. Investigate the socioeconomic implications of illicit mining on local communities and the broader economy.

2.0. Mapping Illicit Mining Risks

2.1. Tanzania Regulatory Efforts Against Illicit Mining and Associated Challenges

The Tanzania Mining Commission (TMC) is the primary regulatory body overseeing the mining sector in Tanzania. With a mandate to ensure compliance with mining regulations and environmental standards, TMC plays a pivotal role in combating illicit mining activities¹⁰. It issues licenses, monitors mining operations, and investigates instances of illegal mining or mineral smuggling.

¹⁰ TUME YA MADINI – Official Website (tumemadini.go.tz)

Through its regulatory oversight, TMC works to maintain the integrity of the mining industry and safeguard Tanzania's mineral resources from exploitation and unauthorised extraction.

Working in tandem with TMC, the Tanzania Revenue Authority (TRA)¹¹ plays a critical role in combating illicit mining by ensuring proper taxation of mining activities. TRA is tasked with collecting taxes and duties related to the mining sector, thereby discouraging underreporting or evasion of taxes by mining companies engaged in illicit activities.

Beyond TMC and TRA, various other agencies also contribute to the fight against illicit mining in Tanzania. The Prevention and Combating of Corruption Bureau (PCCB)¹² investigates cases of corruption and bribery within the mining sector, addressing underlying issues that may facilitate illicit activities such as the fraudulent acquisition of mining permits or licenses.¹³

In the enforcement, the Tanzania Police Force may intervene to enforce laws related to illegal mining activities and the smuggling of minerals. Their efforts complement the regulatory functions of TMC and other agencies, enhancing surveillance and enforcement capabilities to combat illicit mining effectively.

Despite efforts by regulatory bodies and law enforcement agencies, illicit mining continues to pose significant challenges in Tanzania, as evidenced by recent incidents. The arrest of 10 mineral traders attempting to smuggle gold worth Sh1.5 billion on March 20, 2024, highlights the persistence of illicit activities within the mining sector. The discovery of 344 pieces of smelted gold weighing 9.8 kilograms, along with associated tools for smelting and measuring gold, underscores the scale and sophistication of illicit operations. Such incidents reveal the resilience of illegal networks and the ongoing need for enhanced enforcement measures to combat illicit mining effectively. Despite regulatory frameworks and enforcement efforts, illicit actors often exploit gaps in monitoring and enforcement, facilitating the illicit extraction, processing, and trade of minerals.

¹¹ Tanzania Revenue Authority - Home (tra.go.tz)

¹² TAKUKURU – TAASISI YA KUZUIA NA KUPAMBANA NA RUSHWA (pccb.go.tz)

^{13 1662104570-}CHAPTER 329-THE PREVENTION AND COMBATING OF CORRUPTION ACT.pdf (parliament.go.tz)

¹⁴ Tanzanian police nab mineral traders trying to smuggle gold worth Sh1.5 billion | The Citizen

2.2. Understanding of the actors involved in Illicit Mining

There are multifaceted nature of actors operating in illicit gold movements across eastern and central Africa, highlighting the diverse range of participants and motivations at play. This network of actors intersects across politics, business, law enforcement, and criminality, exploiting both legal and illegal markets to advance their interests (Hunter M & et al, 2021). Often, these actors manipulate artisanal and small-scale gold mining (ASGM) operations and associated gold trade across Africa for political and economic advantages at the expense of vulnerable populations.

The detrimental ramifications of gold and precious metal smuggling, characterised by substantial annual revenue losses estimated in the billions, are multifaceted. This illicit activity not only exacerbates existing environmental degradation and human rights violations but also significantly impedes the enforcement of legal frameworks. Moreover, it is imperative to acknowledge that the primary determinants influencing illicit gold flow networks are subject to contextual variables such as political dynamics, regulatory protocols, levels of economic advancement, etc.

Additionally, the intricate nature of these networks is further compounded by the propensity of individuals to assume various roles within the illicit gold supply chains, posing considerable challenges to the systematic identification and delineation of critical stakeholders. Despite the importance of this task, the systematic identification and characterisation of these actors and their involvement remain highly challenging across the globe, particularly in Tanzania. (Hunter, 2019)

2.3. Description of the various forms of illicit mining

Data on illicit Mining are tough to get. Hence, different reported scenarios were used to describe illicit mining activities.

a) Smuggling

Smuggling, a persistent issue in Tanzania's economic landscape, has drawn significant attention from both the media and the government due to its detrimental impact on revenue streams. Primarily targeting valuable

minerals such as Tanzanite, Gold, and other precious metals, this illicit activity has led to substantial financial losses estimated in the billions by the Tanzanian government. Despite regulatory measures implemented as early as 2017, 2019, and 2020 to control mineral trading, the problem persists, signalling a need for more robust enforcement mechanisms.

However, past incidents have undermined public confidence in the government's efforts to combat smuggling,¹⁵ including the controversial pardon of police officers implicated in gold smuggling in 2019.¹⁶ The apparent leniency shown in this case raises questions regarding the authenticity of government claims and the possible involvement of influential figures within the system. The decision to forego significant sums of money from 315 kilograms of gold, worth 305 million, linked to smuggling incidents has fuelled speculation about ulterior motives or vested interests at play.¹⁷ This affirms that Law enforcement actors at different levels are involved in smuggling activities.

In response to this ongoing challenge, the President mandated heightened collaboration between security agencies and the Ministry of Minerals in 2022 to combat mineral smuggling effectively.¹⁸ This directive underscores the government's recognition of the critical need to safeguard revenue for developmental initiatives. However, despite these efforts, reports of rampant smuggling continue to surface, particularly within the Tanzanite industry, causing concern among significant importers like the United States, India, and Germany. The secretive nature of these operations complicates efforts to identify and prosecute those involved.¹⁹

In line with governmental warnings, the Minister of Minerals issued stern admonitions against mineral smugglers, emphasising the severity of legal consequences for offenders. The subsequent arrest of eight Geita region traders for smuggling gold demonstrates the government's commitment to enforcement. Notably, Biteko urged traders to utilise official mineral trading centres rather than engaging in illicit street transactions, bolstering industry transparency and accountability.^{20,21}

¹⁵ PM Quashes Mineral Smuggling Claims | Embassy of Tanzania in Tel Aviv, Israel (tzembassy.go.tz)

¹⁶ Mahakama yawaachia huru askari nane waliodaiwa kusafirisha shehena ya dhahabu | Mwananchi

¹⁷ Ibid

^{18 &#}x27;Curb mineral smuggling' - Daily News

¹⁹ Smuggling Claims Could Dent the Tanzanite Trade | The Citizen

²⁰ Eight traders arrested in Tanzania for smuggling gold-Xinhua (news.cn)

²¹ Eight traders arrested for smuggling gold from Tanzania - The East African

Recent events underscore the severity of the issue, as Tanzanian police arrested ten mineral traders attempting to smuggle gold worth Sh1.5 billion on Wednesday, March 20, 2024. The suspects were found with 344 pieces of smelted gold weighing 9.8 kilograms and various tools used for smelting and measuring gold. Minister for Minerals Anthony Mavunde announced the arrests, stating that the traders were apprehended on March 16 in the Ilomba neighbourhood of Mbeya City. In response, Minister Mavunde ordered the suspension of the suspects' mining business licenses nationwide pending investigations before their arraignment in court. He urged all mineral traders to ensure compliance with laws and regulations governing the mineral trade in the country, warning that those found smuggling minerals would face legal action and lose their licenses.²²

In conclusion, while the Tanzanian government has taken steps to address smuggling through regulatory frameworks and enforcement actions, persistent challenges and inconsistencies undermine public trust and effectiveness. To combat smuggling effectively, there is a pressing need for comprehensive strategies that address root causes, enhance regulatory oversight, and promote accountability across all levels of the mineral supply chain.

b) Mineral laundry

Mineral laundering, a prevalent practice in regions fraught with conflict, poses significant challenges to regulatory oversight and transparency in the global mineral trade. Minerals extracted from conflict zones often find their way to countries with lax import regulations, such as the United Arab Emirates (UAE), where they are refined before being distributed to various market destinations, including Switzerland, the United States, and Germany. This process is particularly concerning due to the lack of independent audits conducted on the sourcing practices of many large refineries, which may inadvertently facilitate the laundering of minerals, particularly gold (Blore & Hunter, 2020).

In the Tanzanian context, there exists a high likelihood that neighbouring countries engage in mineral laundering within their borders. Regulatory loopholes, such as those outlined in Regulation 6.1 regarding the sale of

²² Tanzanian police nab mineral traders trying to smuggle gold worth Sh1.5 billion | The Citizen

minerals at Mineral and Gem Houses, create opportunities for illegal miners and smugglers to exploit the system. The regulation allows individuals, with or without licenses, to sell their minerals through these markets, thereby attracting illicit activities. A resident mining officer emphasised the importance of incentivising artisanal and small-scale miners (ASM) to sell their minerals through official channels to mitigate the risk of increased smuggling and revenue loss.²³

"The regulation is designed to cater to numerous Tanzanians engaged in various aspects of the artisanal and small-scale mining (ASM) value chain, acknowledging that some may not possess licenses. However, it is imperative to incentivise all ASM participants to utilise official markets for mineral transactions regardless of licensing status. Failure to do so risks exacerbating smuggling activities outside Tanzania, leading to significant revenue losses."

Moreover, several incidents, such as the Ruby Gemstone Saga in Dubai, suggest the potential laundering of neighbouring minerals to access global markets.^{23,24} In 2022, a rough ruby of supposedly Tanzanian origin, recognised as the world's largest, was unveiled in Dubai for auction. Despite Tanzanian authorities expressing interest in verifying its origin and certification, conflicting statements emerged regarding its provenance. While the gemstone was said to have been mined in Tanzania, it was allegedly purchased by a billionaire collector in the United States at a private sale.^{26,27}

The lack of transparency surrounding the acquisition and auction of the ruby underscores the challenges in tracing the origin of minerals in the global supply chain. Despite promises of significant financial benefits for Tanzania, including infrastructure development for artisanal mining communities, the ambiguity surrounding the ruby's provenance raises concerns about the integrity of the mineral trade and the potential for exploitation by powerful actors.

²³THE-MINING-MINERAL-TRADING-REGULATIONS-2010.pdf (madini.go.tz)

²⁴ Record-breaking Tanzanian ruby exposed in Dubaï | Africanews

²⁵ Rare \$120 million rough ruby from Tanzania unveiled in Dubai | The Citizen

²⁶ New twist in the origins of unique Ruby in Dubai | The Citizen

²⁷ Rare \$120 million rough ruby from Tanzania unveiled in Dubai | The Citizen

In conclusion, addressing mineral laundering requires comprehensive regulatory reforms, enhanced transparency measures, and international cooperation to ensure accountability throughout the mineral supply chain. Without robust mechanisms to verify the origin and legitimacy of minerals, countries like Tanzania remain vulnerable to exploitation and revenue loss. ^{28,29,30}

c) Illegal Mining

On January 14, 2024, a tragic incident unfolded in the Ikinabushu mine located in the Bariadi District of Simiyu Region, resulting in the loss of lives among illegal small-scale gold miners. These individuals had trespassed into the mine against established safety protocols and were subsequently buried under debris. Notably, the mining area lacked the necessary licensing, and its operations had been suspended due to non-compliance with mining regulations.³¹

This incident sheds light on a pervasive trend wherein individuals clandestinely infiltrate mines, particularly during nighttime, to search for gold and conduct excavations in unlicensed areas. Despite the evident risks and legal violations, the Minister of Mines has opted not to halt operations but issued directives to formalise the area. However, this approach of refraining from imposing penalties only serves to incentivise illegal mining activities and perpetuates a cycle of non-compliance.

Moreover, continuing operations in unlicensed mining areas pose additional risks, particularly concerning the laundering of illegally imported gold from neighbouring nations. Tanzania's current regulations still allow unlicensed individuals to bring minerals into established markets and refineries, thereby facilitating the illicit flow of minerals.³² This loophole undermines regulatory efforts and compromises the integrity of the mineral supply chain, potentially fuelling further illegal activities and revenue losses for the country. Another school of thought is that perhaps there are high-profile figures interested in the area.

²⁸ SAKATA LA RUBY DUBAI: WAZIRI BITEKO AJIBU - "YAPO MENGINE 25, WATANZANIA WANA HAKI YA KUKASIRIKA" - YouTube

²⁹ Record-breaking Tanzanian ruby exposed in Dubaï | Africanews

[№] RUBY YA TANZAŇIA ILIYOONEKANA DUBAI IKIUZWA, SERIKALI YATOA MAJIBU BUNGENI - "MMILIKI NI MMAREKANI" - YouTube

³¹ Landslide in Tanzanian 'unsafe' mine leaves 22 dead | The Citizen

3.0. Potential Revenue Collection Risks from the Discussed Illicit Mining Scenarios

a) Loss of Tax Revenue

Illicit mining activities, such as smuggling and illegal mining, undermine the government's ability to collect taxes on mineral exports. Smuggled minerals bypass official channels, depriving the government of tax revenue that could contribute to national development projects. Persistent challenges and inconsistencies undermine tax collection efforts despite efforts to combat smuggling through regulatory frameworks and enforcement actions. The arrest of eight traders in the Geita region for smuggling gold indicates persistent challenges in controlling smuggling activities and potential tax revenue losses for the Tanzanian government.³³

The recent arrest of 10 mineral traders attempting to smuggle gold worth Sh1.5 billion in Tanzania represents a significant threat to government revenue. With 344 pieces of smelted gold weighing 9.8 kilograms seized, 34 substantial sums of money were involved in this illegal activity. Minister for Minerals Anthony Mavunde's swift action, including the suspension of the suspects' mining business licenses nationwide, underscores the seriousness of the issue. If left unchecked, such smuggling operations undermine the integrity of the mineral trade and result in considerable financial losses for the government. It highlights the ongoing challenge the Tanzanian government faces in combating mineral smuggling and the importance of stringent enforcement measures to safeguard national resources and revenues.

b) Erosion of Market Confidence and Investment.

The prevalence of illicit mining practices, particularly mineral laundering, can erode market confidence and deter foreign investment in Tanzania's gold and precious metals ore sector. Instances of mineral laundering, where minerals are sourced from conflict zones and illicitly traded through countries with lax import regulations, raise concerns about the integrity of the global mineral trade.

³³ Eight traders arrested for smuggling gold from Tanzania - The East African

³⁴ Tanzanian police nab mineral traders trying to smuggle gold worth Sh1.5 billion | The Citizen

The lack of transparency and accountability in the mineral supply chain undermines investor confidence. It may lead to reduced investment in the sector, limiting its potential for sustainable growth and development. The Ruby Gemstone Saga in Dubai, where conflicting statements emerged regarding the provenance of a large ruby purportedly mined in Tanzania, further undermining market confidence and potentially deterring foreign investment.³⁵

c) Environmental and Social Costs

Illegal mining activities, such as unauthorised excavations in unlicensed areas, pose environmental and social risks that can result in long-term economic consequences. Incidents like the tragic event in the Ikinabushu mine,³⁶ where illegal small-scale miners trespassed into the mine and lost their lives due to non-compliance with safety protocols, highlighting the human toll of illicit mining. Additionally, unregulated mining activities contribute to environmental degradation, including deforestation, soil erosion, and water pollution, adversely affecting local communities and ecosystems. The resulting environmental and social costs may strain government resources allocated for remediation efforts and social welfare programs, further exacerbating revenue risks for the country.

4.0. Conclusion and Recommendations

4.1. Conclusion

In conclusion, the paper sheds light on the intricate landscape of revenue collection risks within Tanzania's gold and precious metals ore sector, primarily stemming from illicit mining activities. Despite the sector's significant contribution to the country's economy, persistent challenges such as smuggling, mineral laundering, and illegal mining undermine government efforts to collect taxes, erode market confidence, and impose environmental and social costs. While regulatory frameworks and enforcement actions have been implemented to address these challenges, persistent inconsistencies and loopholes pose significant risks to revenue collection and sustainable development in Tanzania.

³⁵ Record-breaking Tanzanian ruby exposed in Dubaï | Africanews

³⁶ Landslide in Tanzanian 'unsafe' mine leaves 22 dead | The Citizen

4.2. Recommendations

By implementing the recommendations below and adopting a holistic approach to addressing illicit mining challenges, Tanzania can unlock the full potential of its gold and precious metals ore sector, ensuring sustainable economic growth and development while safeguarding the nation's natural resources and social well-being.

- Enhance laws and regulations governing the mining sector to close loopholes allowing illicit activities such as smuggling and illegal mining.
- Implement robust licensing and permitting procedures for mining operations, ensuring transparency and accountability in allocating mining rights.
- Establish clear guidelines for environmental protection and sustainable mining practices to minimise the environmental impact of mining activities.
- Given the transnational nature of illicit mining, Tanzania should collaborate with neighbouring countries and international partners to address cross-border smuggling and mineral laundering. Information sharing and joint enforcement efforts can help disrupt illicit supply chains and strengthen regional security.
- Engage local communities in formal mining processes while providing them with alternative livelihood opportunities to help reduce the incentive for illegal mining activities.
- Implement mechanisms for transparent reporting of mining revenues, including royalties, taxes, and other payments to the government.
- Encourage mining companies to disclose information about their operations, including production volumes, exports, and revenues, to promote accountability and public scrutiny.
- Facilitate participation and oversight by civil society organisations, local communities, and independent auditors to ensure that mining revenues are appropriately collected and utilised for the country's benefit.

- Investing in the capacity building of regulatory agencies, law enforcement, and judiciary personnel is crucial to combating illicit mining effectively. Training programs on mining regulations, investigative techniques, and legal procedures can improve coordination and effectiveness in addressing revenue collection risks.
- Encourage mining companies to adopt responsible sourcing practices to ensure that gold and precious metals are not sourced from conflict-affected or high-risk areas.
- Collaborate with international initiatives such as the Extractive Industries Transparency Initiative (EITI) and the Kimberley Process Certification Scheme to promote responsible mining and trading of minerals.
- Strengthen due diligence requirements for companies involved in the supply chain to prevent laundering illicitly mined minerals.
- Ensure meaningful consultation and participation of local communities in decision-making processes related to mining activities, including revenue sharing and benefit distribution.
- Promote alternative livelihood opportunities for communities dependent on artisanal and small-scale mining, providing training and support for sustainable economic activities.

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