

# Artisanal Gold Monitoring Pilot Phase II Progress Report October-December 2016



*Project funded by the Public-Private Alliance for Responsible Minerals Trade (PPA)*

# Editorial

Artisanal Gold Monitoring Pilot. Phase II Progress Report: October-December 2016

Front Cover image: 'Rond Point des Martyrs', Mambasa centre, Ituri, DR Congo (IPIS, December 2016)

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The **Public-Private Alliance for Responsible Minerals Trade (PPA)** is a multi-sector and multistakeholder initiative to support supply chain solutions to conflict minerals challenges in the Democratic Republic of Congo (DRC) and the Great Lakes Region (GLR) of Central Africa. The PPA provides funding and coordination support to organizations working within the region to develop verifiable conflict-free supply chains; align due diligence programs and practices; encourage responsible sourcing from the region; promote transparency; and bolster in-region civil society and governmental capacity.

**International Peace Information Service (IPIS)** is an independent research institute, providing governmental and non-governmental actors with information and analysis to build sustainable peace and development in Sub-Saharan Africa. The research is centred around four programmes: Natural Resources, Business & Human Rights, Arms Trade & Security, and Conflict Mapping.

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# 1. Executive summary

In April 2016, the Public Private Alliance for Responsible Minerals Trade (PPA) granted IPIS funds to implement a pilot monitoring system for gold production and trade in eastern DRC. The first overall objective of this pilot is to enhance local capacities to monitor gold supply chains according to a system that balances data accuracy with safety/security, and cost. The second objective is to facilitate access to useful data for a variety of stakeholders in support of sector transparency, good governance and responsible sourcing. In doing so, the pilot will examine the scalability and sustainability of the monitoring system.

This pilot has been broadly conceptualised as unfolding over three phases during the project life cycle:

- (1) Hub selection, preparatory assessments and methodological development;
- (2) Pilot initiation and capacity enhancement; and
- (3) System implementation.

Following an oversight of the main outputs facilitated by the PPA grant during Phase I and II, this Progress Report describes the approach IPIS took in initiating the pilot. It traces how the project team finalised its data collection and assimilation tools and prepared the ground for the pilot's implementation through local outreach and capacity-enhancement. A final part draws reflections from operating this phase, with an eye to implementation, sustainability and scalability.

## 2. Grant outputs at a glance

The PPA grant supports IPIS in developing a number of concrete outputs. These can be subdivided in results and tools. IPIS invites all interested stakeholders to express their interest in collaborating to further develop and apply these tools in order to achieve more such results in other geographic areas.

### Results:

- **Prospection results:** IPIS has undertaken three prospection missions to Watsa/Durba (Haut-Uélé), Mambasa (Ituri) and Nyawaronga (South-Kivu) to assess their potential for responsible sourcing (a fourth and final prospection mission to Kampene (Maniema) will be undertaken during Phase III). The 'hub prospection profiles' are publically available (see Phase I progress report for Watsa/Durba and Nyawaronga), and IPIS can provide more detailed information on request.
- **Capacity-enhancement and sensitisation:** IPIS has undertaken a capacity-enhancement and sensitisation program in Mambasa on responsible sourcing for around 30 participants from civil society, local (mining) authorities and mine site managers. This was coupled to an in-depth training component for around 15 surveyors/monitors, who will be further supported throughout the data collection of Phase III. This is leading to more awareness and discussion in and around Mambasa on due diligence, which will be of use to any stakeholder interested in setting up responsible sourcing initiatives in the area.
- **Good working relationship between mining authorities and civil society:** the close cooperation between SAESSCAM and civil society in the capacity enhancement programme has laid the foundations for a durable working relationship between both partners which will benefit the data collection of Phase III, as well as the monitoring of mining and trade in the long run.
- **Monitoring data:** the PPA grant allows the trained civil society and state surveyors, with the close support of IPIS, to continuously collect data on operational, socio-economic and due diligence aspects of gold mining and trade between January and June 2017. At the end of Phase III, IPIS will present the results of this 6-month monitoring pilot in the form of an online cartographic visualisation as well as an analytical report. Both will highlight the most important trends and observations with regard to responsible sourcing in the Mambasa area. Politically or commercially sensitive data will only be available on request, following a genuine due diligence check by IPIS of the potential data recipient.

### Tools:

- **Prospection methodology:** in selecting a pilot hub, IPIS created a dedicated prospection methodology. This methodology is ready to be leveraged to identify more areas with a responsible sourcing potential in the future.
- **Data collection and assimilation methodology:** IPIS invested considerable time in developing a data collection and assimilation methodology (including a risk management planning), which will be further optimised during and based upon the lessons learned from Phase III. The methodology enables a dynamic data flow on operational, socio-economic and due diligence aspects of artisanal gold mining and trade that relies on and reinforces local capacities of civil society and state agents. IPIS will grasp the opportunity of publishing the monitoring report and webmap to promote this tool to potential partners and funders. It actively seeks opportunities for cooperation and partnership to apply this methodology for improving the monitoring of artisanal gold production and trade in other geographic areas of Eastern DRC, and beyond.
- **Training package:** with the support from the grant a dedicated two-pronged training package was developed to lay the foundations for the monitoring pilot. One component is designed to sensitise and train a broad audience from diverse backgrounds in (remote) mining areas on issues of due diligence and responsible sourcing. Another component serves to enhance the available capacities of mining

state agents and civil society in such remote areas to take on monitoring assignments in the context of this project, as well as more generally. IPIS stands ready to deliver this training package in other areas and towards different audiences in order to ensure a broader awareness on responsible sourcing and better monitoring, not only in regional capitals, but also – and particularly – in remote mining areas where these aspects are often most missing and needed.

- **Questionnaires:** the PPA grant allowed IPIS to develop three dedicated mobile/digital questionnaires to put the monitoring methodology in practice. This includes one on baseline mining data, another one on operational mining issues, and a final one on due diligence criteria. In cooperation with local civil society and state agents, IPIS grafted these three questionnaires on the specific context of artisanal gold mining in Mambasa. IPIS looks forward to cooperate with other parties to tweak and align the questionnaires in order to set up more monitoring systems in other artisanal mining areas of Eastern DRC.

## 3. Approach to Phase II

There are two main components to the Phase II approach. On the one hand, IPIS operationalized the conceptual methodology that was developed throughout Phase I (see section 3.1.). On the other hand, the project team prepared for launching the project in Phase III by reaching out to, sensitising and enhancing the capacity of local partners (see section 3.2.).

### 3.1 Data collection methodology: operationalization

Upon finalizing the draft methodologies for data collection and assimilation, as well as the risk management planning, IPIS engaged in follow-up consultations with partners to collect final views and feedback. These were incorporated by IPIS project staff, which allowed concluding the conceptual phase and prepare for the implementation of the designed methodologies.

This operationalization consists of three main elements: elaborating the monitoring sheets for SAESSCAM and CSO surveyors (section 3.1.1.), defining the tasks of the joint monitoring teams (section 3.1.2.) and designing a system for planning and follow-up of the monitoring missions (section 3.1.3.).

#### 3.1.1 Developing the monitoring sheets

Based on IPIS' experience with monitoring the mining and trade of minerals in Eastern DR Congo, as well as dedicated consultations and extensive research, the project team developed three distinct monitoring sheets for this pilot: one on 'baseline data', another on 'due diligence' and finally one on 'mining operations'.

The first drafts of these monitoring sheets were shared for feedback with experienced Congolese surveyors and mining experts. They were subsequently reworked and presented for elaborate group discussions with SAESSCAM and CSO participants during the December training in Mambasa (see further section 3.2.2.). This allowed us to graft the sheets on the local context and adapt them to the understanding and capacities of the local surveyors, as well as those of respondents on Mambasa's mine sites.



*Group discussions on the monitoring sheets during the training in Mambasa (IPIS, December 2016)*

The first monitoring sheet contains baseline data points that are either invariable, are not expected to change within the monitoring period, or where any possible change is considered not particularly relevant for the purposes of this pilot. Baseline data points include mine site coordinates, location, name, access routes, (distance to) support village(s), concession status, exploitation type, soil type, gold characteristics, other minerals or (semi-)precious stones extracted, location of the mineral processing area, organisation of work, and phone coverage. This data will help to better map and understand the nature of the artisanal mining area covered by the pilot.

A second monitoring sheet focuses on issues of due diligence. This is based on and aims to cover relevant criteria of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk areas, as well as the regional certification standards of the International Conference of the Great Lakes Region (ICGLR). It includes elements such as presence of pregnant women, sanitary facilities for women, (worst forms of) child labour, roadblocks, taxation by state services, (non-) state armed presence and interference (taxation, pillaging, forced labour, buying/selling of minerals, monopoly on the commerce in non-mineral products, sexual violence, pit ownership), security incidents, social issues, causes and number of accidents and casualties.

The third monitoring sheet on mining operations covers issues such as the number of workers and teams, the number and exploitation status of pits/tunnels, the level of mechanisation, safety equipment, use of explosives, processing tools, night work, migration of workers, organisation of life on the mine site, organisation of gold trade and gold prices.

### **3.1.2 Planning and follow-up of the monitoring missions**

In total, 10 surveyors were trained and selected to operate this monitoring pilot. This includes 5 SAESSCAM and 5 civil society representatives. Each month three joint monitoring teams will leave for about one week to visit between 7 and 12 mine sites each. These missions are planned by the IPIS focal point in Bunia in cooperation with the heads of SAESSCAM Mambasa and *Réseau Haki na Amani* (RHA) – our civil society partner in Mambasa. This planning is based on the most recent security updates from the ground, as well as the distances, size of sites, and complexity of the monitoring endeavour.

As explained in the pilot project’s Data Collection and Assimilation Methodology, as well as the IPIS Risk Management Planning, these teams will be in permanent contact with the IPIS focal point in Bunia as well as with Belgium-based staff through their mobile phones as well as satellite devices. This allows project staff to follow up closely on the mission, and surveyors to immediately discuss any deviations from the planning or unforeseen events.



*IPIS project staff instructing training participants on the use of satellite communicators*

Surveyors will expand on these elements in a monthly report to be sent to and evaluated by IPIS project staff. This report includes sections on justifying potential alterations to the mission planning, global evaluation of the security situation in the areas visited, further details on any security/social incidents touched upon in the questionnaires, and additional comments on the economic and operational situation on each of the visited mine sites (such as commercial activity on sites, the level of mechanisation, etc.).

The heads of SAESSCAM and the civil society partner will moreover each write a monthly report evaluating the coordination of the monitoring activities, the performance of their agents, observations on the artisanal gold mining sector during that month, perceptions by the Mambasa community on their work, as well as any evolutions in the security situation, or other aspects directly or indirectly related to this pilot project (political changes/events, new stakeholders, plans/activities of industrial miners in the area, etc.).

This reporting will be followed-up closely by the IPIS Focal Point in Bunia, with close oversight from the headquarters in Belgium. The Focal Point will moreover be in daily contact with the teams when they are on the field, and assist them continuously in the preparations and closures of missions.

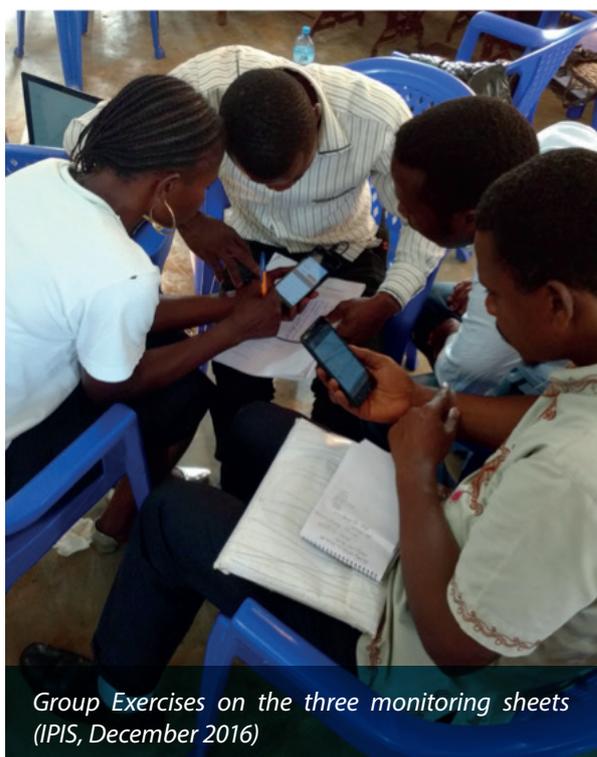
## 3.2 Preparing the ground: outreach and capacity-enhancement

### 3.2.1 Tasks of the joint SAESSCAM-CSO monitoring teams

These three model sheets will serve as guidelines for the surveyors when monitoring activity on and around mine sites. Each sheet has a component of observations and a component of questions to be posed to mine site operators with a specific profile (see further), and checked with a number of their colleagues. When making observations and conducting interviews the surveyors will take notes. On the basis thereof and after leaving the mine site, they will fill out a mobile (Open DataKit – ODK) questionnaire on their smartphone in a quiet and safe setting. These questionnaires will then be sent (and automatically deleted from their phones – for more on risk mitigation and data security see the dedicated project Risk Management Planning) to IPIS project staff upon their return from the monitoring mission.

Each monitoring team consists of one SAESSCAM and one civil society representative. They will always travel and visit mine sites together, and are trained to support each other in this endeavour. Yet, when they are on mine site they have both joint and individual monitoring responsibilities. The time they spend on each monitoring visit will depend on the size of the site as well as the ease with which they can collect the required data. This can range from 2 hours to an entire day.

After introducing themselves to the mine site manager(s) and explaining the monitoring project, they will jointly interview a representative of the mine site management on the basis of the baseline monitoring sheet. The nature of these questions requires engagement with someone who is aware of the entirety of the operations at that site. They will check answers with their own observations as well as through specific interviewing techniques. If they still feel uncertain, they will verify several questions with other people working on the site. This can be by haphazardly asking questions to people they come across or, if necessary, by repeating the entire interview. Data on this monitoring sheet



*Group Exercises on the three monitoring sheets (IPIS, December 2016)*

will evidently only be collected upon their first visit of a mine site, and will not be repeated during revisits later on in the project.

Hereupon, the team will split and collect data separately on the two other monitoring sheets. The SAESSCAM surveyor will continue his engagements with the mine site management on the operational data sheet. This task division is based on the fact that, on the one hand, SAESSCAM representatives are due to their work experience best acquainted with the ins and outs of mine site operations. On the other hand, the mine site management will be best placed to answer questions that cover the totality of the operations on the site.



The civil society representative will seek one or more team leaders (*chefs d'équipe*) who are willing to answer questions linked to due diligence and responsible sourcing. This selection of both surveyors and respondents is based on the fact that this monitoring sheet includes questions on (illegal) taxation and interference by state services and armed actors. Even though the SAESSCAM surveyors have been trained to separate their assignment as surveyor from their role as state agent, and to make this very clear to respondents, there remains a risk that certain replies are distorted. For this reason, the civil society surveyors are the only ones who know the content of this monitoring sheet and who are responsible for this component of data gathering. The choice for team leaders as main respondents is based on the fact that the risk of the latter distorting due diligence data is considered lower than that of mine site manager who is permanently concerned with the image of his/her site.

Several other precautions are taken to avoid distortion of the monitoring and obtain reliable data. These include the manner in which data sheets/questionnaires are designed (indirect questions and data triangulation), interview techniques, data verification with other mine site managers/operators, and meticulous observations by our surveyors during, in-between and after the interviews.

### **3.2.2 Local outreach and partners**

Given that this pilot project is deeply rooted in and based on local Congolese structures and systems, it is essential to get and keep Mambasa's authorities and stakeholders on board. Their buy-in and trust will facilitate the data collection logistically and is also expected to improve the cooperativeness of target communities on and around mine sites.

First of all, IPIS has invested from the outset in explaining the project and its objectives to the Administrator of Mambasa territory. The latter has repeatedly expressed its support and is firmly committed to improving the transparency of the artisanal gold sector. This sector is seen locally as a key livelihood and business that can help bring stability and prosperity to this post-conflict environment. The rapidly improving security situation makes the local community hopeful for the future and provides an ideal setting for this pilot project. The two Adjuncts of the Administrator have put this support in practice by opening and closing the December training, attending the graduation ceremony and regularly dropping by to see how the training was progressing.

Second, SAESSCAM is one of our main local partners in implementing the monitoring pilot. Upon each field mission, IPIS project staff visits their offices (as well as those of its partner organisation *Division des Mines*) in Bunia and Mambasa to discuss progress and future plans. The latter have at every occasion expressed their support and commitment to the pilot project. With the appointment of a permanent IPIS Focal Point in Bunia (who visits Mambasa on a monthly basis) in December 2016 this cooperation has been further solidified.



*The Adjunct Administrator of Mambasa territory opening the training (IPIS, December 2016)*

The practical arrangements between IPIS and the Mambasa antenna of SAESSCAM in executing this monitoring project have been settled in a dedicated MoU concluded with their *Chef de Bureau*. This covers IPIS' engagements to support their surveyors, to provide the relevant material (smartphones, satellite devices) and training; as well as SAESSCAM's engagement regarding the mobilisation and coordination of surveyors, responsibility for the monitoring material, data security, planning and reporting.

Third, the other main local monitoring partner is the civil society organisation, *Réseau Haki Na Amani* (RHA). While their headquarter is in Bunia, Mambasa hosts a local antenna. Following the example of the arrangements with SAESSCAM, IPIS and RHA also negotiated a Memorandum of Understanding. It contains similar engagements, as well as the modalities of additional financial support for this CSO. This serves to support RHA Mambasa for the time of the project by contributing to the rent of their office, the cost of communication, the use of some of their own equipment and the time invested in managing the monitoring exercise.



*RHA Mambasa's office director René Kanigine presenting the work of his organisation at the opening session of the training (IPIS, December 2016)*

Finally, in the spirit of capacity enhancement and sustainability, IPIS has recruited a Focal Point for the project who is part-time coordinating the pilot and part-time continuing his post as Coordinator of the *Cadre de Concertation de la Société Civile de l'Ituri pour les Ressources Naturelles* (CDC/RN). This Bunia-based organisation works as platform for all civil society organisations active on natural resources in the province. This dual role serves a dual purpose. On the one hand, it is crucial to ensure an on-going knowledge and skills transfer from the project to empower the CDC/RN as regional centre of expertise

on artisanal gold in Ituri. On the other hand, this dual role continuously enriches the pilot with contextual input from relevant civil society actors and experts in the area.

### 3.2.3 Training on cartography and mine site inspections

IPIS launched the capacity enhancement dimension of this pilot (which will continue throughout Phase III) with a five-day training on cartography and mine site inspections in Mambasa between 10 and 14 December. This training had two main components: one day of outreach and sensitisation on responsible sourcing for a broader audience, and four days of in-depth training for future SAESSCAM and CSO surveyors.

The first day of the training was open to representatives of *Division des Mines*, SAESSCAM, the cooperative of mine site managers (AFMs) and civil society. Following the opening of the training by the Territorial Administration, and speeches by the representatives of the various organisations present, IPIS presented its work and the objectives of this monitoring pilot.



SAESSCAM Chef de Bureau Jerry Itekenya delivering his opening speech at the training (IPIS, December 2016)

The afternoon was dedicated to informing participants about the relevant national, regional and international frameworks for responsible sourcing. The newly appointed IPIS Focal Point and CDC/RN expert kicked off with a presentation on the Congolese mining code. IPIS researchers followed with presentations on the OECD Due Diligence Guidance, the ICGLR regional certification standards and relevant legal frameworks such as section 1502 of the Dodd-Frank Act and the upcoming EU legislation on responsible sourcing.

The day was wrapped up with a plenary debate on the project's design and objectives in the light of these various frameworks, as well as group discussions and presentations by means of the 'problem tree' approach. The latter stimulates participants to look for causes (roots) and consequences (branches) of a particular local problem (trunk).

The next four days were restricted to participants from SAESSCAM and RHA (15 in total). This included 6 candidate-surveyors and one or two office staff of each organisation (including the *Chef de Bureau*), who will be responsible for coordinating the monitoring endeavour. In order to allow close interaction and individual training and assistance to each of the participants, a total of five IPIS trainers facilitated a diverse range of sessions. This included two international IPIS staff, our Bunia Focal Point who is also CDC/RN expert, and two experienced IPIS surveyors who have regularly undertaking mine site monitoring missions and are well acquainted with the various tools IPIS uses.



Training participants presenting their 'problem tree' analyses at the first day of the training (IPIS, December 2016)

In these intensive four days we held a diverse range of sessions on reading and understanding the monitoring sheets, geology, working with the technical tools (ODK questionnaires, smartphones and satellite communicators), monitoring techniques, team spirit and behaviour on mine sites, risk and security management, performance monitoring, data confidentiality, and reporting. We organised sessions on content in the morning and a lot of exercises including role-plays and simulations in the afternoon.



*Group photo of training participants and trainers on the foyer minier of Bulembi, near Mambasa (IPIS, December 2016)*

On the fourth day of the training, we visited the *foyer minier* of Bulembi, near Mambasa. This gave trainees the opportunity to put a lot of what they had learned in the past days in practice. This included their geological and monitoring observation techniques, interview skills, and the use of various tools in the field. It simultaneously allowed the trainers to observe the strengths and weaknesses of each individual trainee, and provide individualised feedback and advice afterwards.

This was followed on the last day of the training by a short test, allowing participants to demonstrate their skills and knowledge. Only two participants failed the test (also based on permanent evaluation during the training) and will need further assistance by the IPIS Focal Point as well as their colleagues before they will be able to join a monitoring mission. This individual evaluation of each participant moreover makes it possible to form good joint monitoring teams, based on the complementarity between their respective skills.



*Group photo of training participants at the graduation ceremony (IPIS, December 2016)*

## 4. Findings and reflections from Phase II

In operating Phase II of this pilot, IPIS has come to a number of findings and reflections. These concern the need to graft the implementation of the methodology on the local context (section 4.1.), the importance of local capacity enhancement (section 4.2.), and the central role of due diligence monitoring (section 4.3.). These findings and reflections will steer the implementation of Phase III and are central in the ongoing work to ensure the sustainability of the efforts put into this pilot as well as the potential scaling of this methodology in the future.

### 4.1 The need to graft implementation on the local context

While the need to adapt the methodological concept to local circumstances and partners was already central in Phase I (see Phase I Progress Report), this requirement became only more outspoken throughout the operationalization of our data collection system in Phase II. In exchanging with surveyors and various local stakeholders to assure that all aspects of data points covered in the monitoring sheets were comprehensible and unequivocal, it became increasingly clear that the region-specific organisation and jargon of artisanal mining in Eastern DR Congo requires dedicated formulations of indicators and questions, as well as monitoring techniques.

In our operational instructions to surveyors, IPIS therefore took close account of the hierarchical organisation of mining operations in Mambasa territory. This includes how they introduce the project on-site, to whom and in what order, but also how surveyors behave throughout the mission. Also the monitoring sheets were adjusted to the local jargon for tools, jobs, tasks and procedures.

This implies of course that if IPIS is able to replicate this pilot in other areas of Eastern DRC it will not only have to adjust its monitoring concept (as was announced in the previous progress report), but also the exact operationalization. This requires an additional time-investment, which will however pay off in terms of the reliability and validity of the data that is gathered.

### 4.2 The importance of local capacity enhancement

IPIS has always included an important component of capacity enhancement in its mapping of and research on artisanal mining in the DRC. Yet, in these instances IPIS, just like many other international NGOs and donors, mostly relied on and selected partners that were based in one of Congo's regional capitals. Given that that is also where the universities and the biggest part of the scarce skilled labour opportunities are, these cities attract most of the country's educated population.

However, the bulk of Congo's artisanal mining activity takes place in very remote areas, where monitoring and analytical capacity on responsible sourcing is currently missing. One of the key objectives of this pilot is therefore to enhance local monitoring capacities of civil society and state agents for better oversight of the artisanal mining sector. With this project IPIS does not want to send out its trained surveyors to all corners of the province in which they are based, but rather anchor this monitoring capacity locally so that it can benefit the local (mining) community in the longer run.

Given the concentration of most of the skilled and educated labour force in Congo's regional capitals, IPIS felt a great eagerness for, but also an immense lack of training on due diligence, geology, monitoring, analysis, etc., in the Mambasa community. With our five-day training we have to a certain extent met this need, but a lot remains to be done. Given that many of the participants started from a rather low base level, five days were evidently insufficient to turn them into experts on all the areas covered by the trainers.



*Future surveyors engaging in a role-play exercise (IPIS, December 2016)*

The capacity-enhancement component of this pilot can therefore not be a one-off investment, but will be a continuous preoccupation of the project team. For one thing, the Bunia-based Focal Point will visit Mambasa at least once every month. In the first months of Phase III this will mainly be to prepare and follow-up on an individual basis with the surveyors who will be engaged that month. Based on the individual assessment fiche of each participant that was drawn up during and after the December training, the Focal Point will in those sessions highlight those elements he/she had most difficulties with, to ensure that everyone is fully up to speed.

Once all surveyors have undertaken their first monitoring mission, the project team will moreover organise a follow-up training, to gather feedback and ensure that everyone is on the right track. The content of this training will be based on our continuous evaluation of their performance, and will moreover allow IPIS to get an in-depth evaluation from surveyors on their engagement with respondents and their monitoring/interviewing techniques.

### **4.3 The central role of due diligence monitoring**

Throughout the Phase II consultations with stakeholders, engagement on the ground with monitoring partners, and local contacts in Bunia and Mambasa, the importance and urgency of improved monitoring and awareness on due diligence criteria became increasingly apparent. This has two main reasons.

On the one hand, for international actors involved in monitoring and/or operating mineral supply chains from DR Congo, the OECD Guidance and the ICGLR criteria are the frame of reference. However, we noticed that those providing these minerals on the upstream end of the supply chain in Congo are still to a very limited extent aware of the existence of such frameworks, let alone their content. As long as this problem remains, downstream actors will never be able to get reliable due diligence information.

On the other hand, this lack of awareness of formal criteria does evidently not mean that all mining activity in Eastern Congo is irresponsible. The limited availability and accessibility of data on conditions of artisanal gold mining and trade, simply implies that it is currently impossible to determine from where one can source responsibly. Many partners therefore stressed the need for a more dynamic due diligence monitoring system that can capture constantly changing facts on the ground and cover less accessible areas.

This is why due diligence monitoring is an essential element of this pilot project and will be placed central in operating the monitoring system. In the December training IPIS has sensitised key figures in the Mambasa mining administration on the pertinence and meaning of due diligence. Surveyors were trained on how to monitor the observance of these elements in a precise and accurate manner. In posing good questions and conducting interviews on mine sites, there will moreover be an aspect of sensitising mining communities in the focal area. The aspect of valid due diligence monitoring will be followed upon closely, among others in the follow-up training for surveyors in April.

#### 4.4 Data use and follow-up

The data dissemination component of this pilot delivers on its aim of enhancing transparency in the artisanal gold sector by making specific information collected by the monitoring teams available for use by a broad range of stakeholders. It is envisaged that this data output can be put to use for the purposes of due diligence, policy formulation, and promoting and informing responsible sourcing efforts.

Building on IPIS' long track record of data visualisation, the output will occur in two main forms. Firstly, IPIS will develop a cartographic visualisation in a format similar to IPIS' current interactive webmap on conflict minerals in Eastern DRC.<sup>1</sup> This map will locate the different mine sites feeding into the Mambasa trading hub, with a pop-up window for each of them containing certain baseline data. In addition, the map will include various layers related to the nature of mining operations, the broader socio-economic context and due diligence criteria.

A second main output will occur in the form of a concise, well-structured and easily digestible monitoring report that gives an overview of the operational, socio-economic and due diligence aspects of artisanal gold mining and trade in the pilot hub. The substantive analysis will accompany the webmap and will be illustrated/visualised in the form of infographics outlining aggregated data for the area of coverage and thematic static maps.

In light of the potential sensitivities around making certain data available, IPIS opts for a three-tier approach to access that encompasses public access, privileged access and tailored responses to specific queries. These three access types correspond to three data classification categories: non-sensitive data, commercially sensitive data and politically sensitive data.

IPIS has sought to classify data on the basis of its potential sensitivity to aid in determining the level of disclosure appropriate in any given circumstance. While these classifications will be used as a general determinant for the level of disclosure, they should not to be treated as fixed. It is anticipated that certain types of data may fall under a different classification depending on the circumstances surrounding the collection of that data, the prevailing political climate, and/or the entity making the enquiry. As such, all data points being disclosed are to be considered individually in the circumstances.

- **Non-sensitive data – public access:** this data is envisaged as being either non-sensitive in and of itself, or whilst entailing some sensitivity, non-sensitive when made public only after a considerable delay and/or at notable intervals. It generally therefore consists of more slow changing/static information, such as: site coordinates, nature of mining operations, minerals mined, as well as aggregated information for the entire area on worker numbers, OECD conformance (human rights, conflict financing), pricing trends, destination of gold flows and environmental data (mercury use). It is envisaged that such public data dissemination will provide a basic tool to aid in promoting the project, as well as a platform from which stakeholders can access more privileged data on demand.
- **Commercially sensitive data – privileged access:** this data is envisaged as entailing some sensitivity due to its utility to commercial awareness and competitive practices. In general, this refers to site-specific/disaggregated information on worker numbers, gold pricing, taxes and fees, and destination

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<sup>1</sup> Please see: <http://www.ipisresearch.be/mapping/webmapping/drcongo/v4/>.

of gold flows. Such data will be subject to privileged access granted to requesting PPA members, as well as non-PPA entities subjected to a due diligence check by IPIS.

- **Politically sensitive data – tailored response to specific queries:** this relates to issues that are politically sensitive and therefore not appropriate for raw distribution, be it through public or privileged access. It refers to issues such as the identities of certain actors in the (illegal) supply chain and details of certain security, fraud, conflict financing and human rights incidents. IPIS will respond to specific requests for such information, envisaged in the context of due diligence enquiries. These requests will be responded to once the identity of the data user is known and the security status of the information requested has been verified.