

Human Rights Status in the Gold Supply Chain of Uganda: A Case for Artisanal Small-Scale Mining in Karamoja Region



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Abbreviations and Acronyms

ABEK	Alternative Basic Education for Karamoja
ASM	Artisanal and Small Scale Mining
ASGM	Artisanal Small Scale Gold Miners
ARM	Alliance for Responsible Mining
CBO	Community-based Organization
CAO	Chief Administrative Officer
CPRC & DRT	Chronic Poverty Research Centre & Development Research Training
CSO	Civil Society Organisations
DGSM	Department of Geological Survey and Mines
DRC	Democratic Republic of Congo
ECO	Ecological Christian Organization
EIA	Environmental Impact Assessment
EL	Exploration Licence
FPIC	Free, Prior, Informed Consent
GLA	Global Rights Alert
ILO	International Labour Organization
IP	Intellectual Property Rights
LCI, II, III	Local Council I, II and III
LGs	Local Governments
LL	Location Licence
MADEFO	Matheniko Development Forum
MDL	Mineral Dealers License
MEMD	Ministry of Energy and Mineral Development
MDL	Mineral Dealers License
ML	Mining Lease
NAMSA	National Artisanal and Small Scale Miners Association
NEMA	National Environmental Management Authority
OPM	Office of the Prime Minister
PRR	Protect, Respect and Remedy
SMMRP	Sustainable Management of Mineral Resource Project (2004-2011)
UCMP	Uganda Chamber of Mines and Petroleum
UGX	Uganda Shillings
UPDF	Uganda peoples Defence Forces
URA	Uganda Revenue Authority
UN	United Nations
USD	United States Dollar
VAT	Value Added tax

Executive summary

This study examines the human rights excesses that otherwise hurt and disadvantage artisanal mining in the gold supply chain Karamoja in Sub region in Uganda. The Artisanal Small scale mining “*gold supply chain*” discussed here relates to gold mined in Rupa sub-county, Karamoja region, Uganda. The chain includes Artisanal small-scale gold miners (diggers) in Rupa sub-county, dealers and government regulatory agencies namely MEMD, DGSM, LGs, NEMA and URA. Gold extracted at Rupa is bought on-site by dealers from other regions of Uganda and neighbouring Kenya. It is then transferred to either Uganda’s capital, Kampala, or Nairobi, the Kenyan capital, for resale (ARM, 2011). The study also discusses human rights violations and abuses in the supply chain of ASM Gold supply Chain at the level of extraction site, working conditions of artisanal miners as well Violations and abuse of Environment, Cultural and Development rights. It is observed that the artisanal small-scale miners’ gold supply in Uganda is faced with a number of human rights injustices. The human rights injustices clearly constrain its performance, development and good governance. The most critical injustice is government’s failure to recognize Karamojongs as indigenous peoples. Our considered opinion is that for mining to benefit the local communities in Karamoja; government needs first to recognize Karamojongs as Indigenous Peoples. Secondly, this recognition must be followed by a review of the current mining Code to enable protection of Karamojong IPs right to land and territory, right to consultation & participation, and the right to FPIC as is enshrined the UN Declaration on rights of Indigenous Peoples, the 1981 African Charter on Human and Peoples' Rights.

It was also found out that community consultation and participation in mining and acquisition of mining rights is inadequate. Analysis of the mining regulatory framework in terms of encouraging or sanctioning **traceability** and **certification** shows that presently, there is no official mechanism for traceability or for certification regarding artisanal-mined gold.

However, the dealers we consulted to maintained that they can tell the gold from Rupa because it is the best. Sure, “we must know to avoid being duped by unscrupulous agents” said a dealer in Moroto town. Transport of the small quantities of gold procured in Rupa form ASM is usually by road.

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ABOUT GLOBAL RIGHTS ALERT

Global Rights Alert is a Non Governmental Organisation, whose vision is a *community where all human rights are realize* . Our mission is to *promote social accountability through engagement of rights holders and duty bearers*

GRA was established in 2007 to bridge the gap between the duty bearers and rights holders with regard to the extractive industries (Oil, Gas and Mining) and health. It therefore encourages the localization of legislation and policies in order to increase awareness and foster downwards social accountability mechanisms within the framework of the extractive industry. In undertaking these activities GRA focuses on the following objectives:

1. To initiate and implement strategies that promote human rights
2. To train and create awareness on the scope human rights
3. To monitor the country's compliance with regard to the implementation human rights as required by relevant local and international human rights instruments.

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1. Introduction

Human rights and freedoms belong to individuals by virtue of the fact that they are human beings. Human rights and freedoms are not granted by the State, neither can they be taken away by the State. A right is a power, privilege, or immunity guaranteed under the international Conventions and Treaties, In Uganda the Constitution, Statutes, Acts, policies and guidelines provide for the protection of human rights. Rights are legally enforceable claim of one person against another, that the other shall do a given act, or shall not do a given act. Human rights protection and enforcement can be a formidable weapon against the impacts of “unnecessary” development or development that does not benefit neighbouring local communities. Artisanal mining in Karamoja is basically a livelihood for poor people in Karamoja. This paper examines the human rights excesses that otherwise hurt and disadvantage artisanal mining in the gold supply chain of Uganda.

The Artisanal Small scale mining “*gold supply chain*” discussed here relates to gold mined in Rupa sub-county, Karamoja region, Uganda. The chain includes Artisanal small-scale gold miners (diggers) in Rupa sub-county, dealers and government regulatory agencies namely MEMD, DGSM, LGs, NEMA and URA. Gold extracted at Rupa is bought on-site by dealers from other regions of Uganda and neighbouring Kenya. It is then transferred to either Uganda’s capital, Kampala, or Nairobi, the Kenyan capital, for resale (ARM, 2011). Artisanal and Small-scale Gold Mining (ASGM) in Karamoja region and at Rupa sub-county site has been practiced for a long time, usually as a livelihood coping mechanism due to loss of the main traditional pastoral livelihood. Most miners in Rupa are Indigenous to the communities or long-time residents in the area. Rupa population consists of two clans: Matheniko (the majority) and a marginalised and minority group known Indigenous Peoples (Nalule, 2010). ASGM, also referred to as “**subsistence**” mining of gold in Rupa, like elsewhere in Uganda, is characterized by manual hauling, crushing, grinding, and panning methods, that are laborious. Usually, the men and boys do the digging of pits, shafts and tunnels using sticks (in some cases iron rods) while women and girls fetch water and do the separation of gold from waste minerals (tailings) through panning using plastic basins. Water is a key ingredient in the panning process and therefore its availability or absence can have bearing on the amount of gold produced by an ASGM miner. Scarcity of water in Rupa due to prolonged droughts is a reality. However, note that ***under no circumstances would a miner show or disclose to anyone the quantity of gold obtained in a day, save for the dealer.*** This ASGM legacy of “*covertness*” probably derives from the past regimes when miners conceived gold mining as illegal. Accordingly, ASM in Rupa gold mining sites is predominantly informally organized or disorganized (Hinton *et al.*, 2011). Uganda's gold production has increased largely due to deregulation of gold sales by the Central Bank as well as gold from neighbouring DRC being sold in Uganda. Gold contributes up to 30% of export revenues from Uganda.

Sections 2 and 3 describe and analyze the different actors involved in the ASM gold supply chain right from mining site to exporter dealer in Kampala. Section 4 deals with the human rights violations and abuse as observed in the supply chain.

2. The Main Actors in Karamoja gold Supply Chain

2.1 The Actors at the Mine Site Level

(a) The Karamojong Council of Elders and Local Councils

According to ARM (2011) before ASM mining begins, miners often obtain informal consent from landowners prior to work (whether they hold land title or not) and some form of profit sharing seems to be preventing related conflicts. While this true elsewhere in Uganda, it is not for Karamoja region and Rupa sub-county. In Karamoja territorial groups, clans, generation and age sets *communally own land*, since time immemorial. A territorial group comprises several cooperating clans of which each clan has a *Council of Elders* who govern the clan. A Council of Elders comprises 20-30 members representing three age sets groupings of a clan [(i.e. Mountains (50 years above), Gazelles (25-49 years) and Rats/Warriors (15-25years)]. Below the *Council of Elders* are Kraal Leaders elected for their specialized skills in livestock management. ***Throughout Karamoja, communal land rights were administratively enforced by the Clan's Council of Elders*** until government superimposed modern institutions of administration on Karamoja traditional structure with hope that the former should replace the traditional structures. Shockingly, for over 25years down the road, modern institutions have failed to take root at the grassroots in Karamoja and Rupa sub-county. For example, save for district local government administration at Moroto, there is no *operational* lower government structures including LCIII, LCII and LC1 in the district. Similarly, apart from the Moroto district Chief Magistrates Court, there are no Grade I and II courts at sub-county levels like happens elsewhere for administration of justice. Therefore, in Karamoja the modern institutions, prescribed by law, operate concurrently with traditional structures of governance. Unfortunately, given that the construct of Karamojongs traditional superstructure is premised on the pastoral livelihood and the modern structures are not effective at the grassroots, ASM gold mining and trade at Rupa site is condemned to **self-regulation or no-regulation**. There is free entry and exist.

(b) The Artisanal diggers

Artisanal miners in Rupa comprise of poor men, women and children. Presently, there are more than 18,000 poor women, men and children practicing ASM in Karamoja region (Hinton *et al.*, 2011) but this figure is steadily rising due to escalated loss of pastoral livelihood resulting from climate change induced hazards. Women miners account for between 50-60% and as high as 90% at some ASGM sites. At the mining site, ASGM operate as independent entities of each other with each miner having exclusive ownership rights over the excavated pit until the pit is exhausted. Instances where miners transfer ownership rights over a "gold pit" to another miner from another family are rare and not documented. Interestingly, while many ASGM miners cry of non-productive pits and proclaim to little yields if any gold from pits, they never stop or give digging pits. A clear indication that they have no other alternatives forms of survival. ASGM in Rupa is practised as an entire family's survival strategy involving the husband, wife and children.



Diggers (male) carry out the alluvial soil for gold separation by women

In case of widows, their children are involved or where they lack children, then they (widows) must remarry a brother or relative of their deceased husband (sort of widow inheritance) to continue to obtain sustenance. Women miners, sometimes, suffer rape during mining events but instances where men steal or otherwise grab gold from women by force are rare or not reported. In addition, to children not going to school (because they helping in the mines), child labour is common occurrence in ASGM.



A young girl extracting gold using water in a basin

Miners (both women and men) expose themselves to a number of occupational risks including chronic exposure to dust and heat (sun scorching), accidents involving flying rock fragments, falling debris and collapse of open pit walls or underground tunnels leading to loss of life. “Wildcat pitting” renders livestock grazing (including free passage of human beings) impossible at ASGM sites because of the risk of falling into pits. A typical artisanal small-scale gold mining day begins at dawn (5.00am) and ends at 2.00pm.

(c)Agents of dealers, Companies or brokers and small traders

At the mining site, every miner or family sells their gold independent (of other ASGM miners) and often by one individual, the head of the family (woman or man). The ASM gold market/auction at the mining site level is very fluid and comprises an open area with mushrooms of make shift grass shrines placed about 10 metres from each other. Brokers or small traders at the sites are either agents of companies holding exploration licenses or simply individual private persons. These small traders run the gold market/auction in Rupa. It begins at about 12.00noon and ends at 3.00pm when the dealers dismantle their shrines and leave. The construct of this market /auction is that of a “mafia” style, highly unregulated and secretive. This market is located near premises of a new village police post perhaps for security reasons. In past, before disarmament of Karamojongs, ASM Miners would go with AK47 riffles (for security) to the market/ auction area while dealers would move with armed protection from the police. Following disarmament, both ASM sellers and dealers go to the market unarmed. A Miner with a “gold catch” for the day enters into the shrine to sell their

gold to the dealer (to the seclusion of the public). As thumb rule of the Rupa gold market, dealers handle one miner at a time. Mostly, the gold transactions on this local market / auction are discrete and involve a high-level non-disclosure. The high-level “*secrecy or non-disclosure*” perhaps presents trade-offs to both parties (sellers and buyers) involved. For the part of the dealers, the motivation could be cheating miners (in terms of price or “scale” measures) as well as evade taxes.



Digger selling his gold to a dealer in a temporary grass shrine

On the part of ASM miners, the motivation for non-disclosure and secrecy could be the thought that by not telling anyone of the quantities mined and sold they avoid royalties or fees payable. To say the least, ASM gold marketing needs streamlining for transparent and accountable gold sales if ASM miners' lives are to improve. Hinton *et al.* (2011) estimated that miners earn between 2,000 to 6,000 UGX/person/day in the dry season but can earn up to 6,000 to 70,000 UGX/person/day (or much more) in

the rainy season.

According to Wikipedia, “*In early April 2011, the local price paid for 0.1 grams of gold was around 7000 Ugandan shillings, equivalent to around 2.5 US dollars. Generally, miners say that they extract between 0.05 and 0.1 grams (known locally as a “point”) each day. This local price level was barely half the price level on international commodity markets. In early April 2011, gold was trading at \$1,476 per troy ounce, equivalent to \$47.45 per gram, or \$4.75 per point*”. According to ARM (2011), Uganda’s law obliges these agents/brokers to acquire a Mineral Dealers License (MDL) from DGSM before commencing with buying of gold from ASM. Unfortunately, Rugdya *et al.* (2010:25) reported no single MDL exists in Karamoja region yet the agents/brokers continue to cheat poor ASGM miners.

(d) Holders of legal Mineral rights (Licensees)

Presently, “legally” exclusive Mineral Exploration Licences (ELs) and Location Licences (LL) cover about 25% of Karamoja region land area with another 20Km² under the only Mining Lease in Karamoja held by Tororo Cement Ltd. This is because of a “licensing rush” by the DGSM to private companies that led to almost to all the ASM areas in the country including Rupa to come under ELs. Consequently, the majority of ASGM takes place on exploration licenses held by others and therefore continues to be unlicensed and informal. While the Mineral law grants exclusive rights to licensees, ARM (2011:19) found the engagement between license-holders and ASGM to be negligible and a “*live and let live*” policy is informally followed. Put simply, majority of the companies holding the ELs are not on the ground. The greatest irony is that local people and ASM in Rupa not only lack information on the size of territorial land parceled out to private companies but also were not consulted when their territorial gold sites were being parceled out to

companies (Rugadya *et al.*, 2010). Instances where the Licence holders plant agents to buy for them gold from ASGM miners are there but cases where EL-holders' have forced ASM operating on their EL to sell to them do not exist. In instances where artisanal miners work under a company---held Location Licence, most are paid via product---purchase arrangements (e.g., gold is simply sold to the licensee in exchange of access to ASGM site rather than through employment (ARM, 2011).

(e) The role of UPDF in Karamoja

KIDDP stands for Karamoja Integrated Disarmament and Development Project coordinated by the Office of the Prime Minister. Under this project UPDF was invited to remove guns from Karimojongs to enhance security and bring the area to serenity. Therefore, the influence of OPM in ASM gold mining in Karamoja and Rupa is through the UPDF creating an enabling a secure operating environment in Karamoja region. Note that due to the ineffective coordination, by the OPM, of Karamoja disarmament that had been designed to be a multi-stakeholder participatory process, the UPDF went sole and unleashed terror on the Karamojongs. Many human rights violations have been leveled against the UPDF's "cordon and search" disarmament tool including rape of women, extra judicial killings, victimization, arbitrary arrests, increased vulnerability to raids occasioned by *Protected Kraals* (Powell, 2010). Many of the victims of UPDF human rights violations are ASM Gold Miners. The UPDF maintains an army detach in the Eastern side of Moroto town and Rupa sub-county up to this day.

(f)Community based groups

The current minerals policy and law recognizes civil society as being crucial in sustainable minerals development. The mandate of civil society associations is mobilization, peer mentoring as well as promotion of standards. The civil society associations are important for holding government accountable and undertaking advocacy on common issues affecting the ASM. Presently, there is only one registered CBO at Moroto district administration for Rupa sub-county called "Karamoja ASGM Association" but it is inactive due to financial limitations. The CBO attempted to obtain a LL license for Rupa ASGM site but failed due to the daunting procedures used by the DGSM for issuing a mineral right license. The other local CSO with interest in mineral sector development include Matheniko Development Forum (MADEFO).

2.2. The Actors at the Trading /Marketing level;

(a)Department of Geological Survey and Mines (DGSM)

DGSM is the primary trading agency for all mineral rights¹ recognised by law in Uganda. By law, the DGSM grants all mineral licences and is expected to monitor

¹ There are only two categories of *mineral extraction rights* traded by the DGSM i.e. Location Licence and Mining Lease. **Location Licence** (LL) or ASGM Licenses - pertain to "small scale operations, prospecting or mining operations" which do not involve expenditure in excess of five hundred currency points [approximately US\$5,000] or the use of specialized technology e.g. cyanidation, floatation. The LL is exclusive, granted for a two-year period and renewable in two-year periods. The LLs vary in area (coverage) depending on whether the gold deposit is alluvial (covers 16 ha) or hard rock or by a mineral (covers 500m X 300m). Less than 5% of the ASGM hold LLs up to this day. **Mining Lease** (ML) or Large scale mining license - applies to any activity with a capital cost investment exceeding five hundred currency points (approximately US\$5,000) and/or that plans to employ specialized technology (e.g. cyanidation, floatation). It is exclusive, granted initially for 8 - 21 years (depending on the quantity of the ore) and renewable once for 15 years. Other Mineral rights traded by the

performances of these licences in Uganda including Karamoja region. A complete application for a “*mineral right*” should include a *certified topographic map of the area, an exploration plan, endorsement by the CAO of the relevant LG, a statement of the number of workers and a project brief* (R. 64 (1) submitted on forms obtainable from the DGSM (ARM, 2011:13-14). The law further demand that before an application is made for an exploration licence, temporary beacons shall be erected and trenches dug in a specified manner (R.55). Licensing is done on a first come first serve basis. The above DGSM’s processes for trading “ *mineral rights*” not only lacks a mechanism for local communities participation in minerals extraction decision-making - a key tenet for sustainable development enjoined in the DGSM mission - but as well technically blocks any opportunity for land owners or occupiers to object to any minerals rights transactions. The DGSM as the **key trading institution** for minerals and mining rights has demonstrated inability to monitor performance of the traded licences. Many licenses expire but continue to operate normally. In addition, while the mandate to receipt fees and rents for minerals exploitation belongs to the DGSM, instances of receipting of such fees and rents at the MEMD as well as sub-county local governments exist. For example **SESAM Enterprises**, *claims that although it paid to the Ministry of Minerals the exploring licence fees, it had to go ahead in September 2011 as well to pay Moruita Sub county (Nakapiripit district) another fee - Chief Finance Office Nakapiripirit.* Therefore, there a range of legal, policy and administrative procedural issues that require urgent attention if governance of the minerals sector is to contribute to local livelihoods and development of ASM in Karamoja. Mostly, mining in Karamoja is “covert and stealthy” because most investors stream in without notifying any local leaders or communities (Rugadya *et al.*, 2010).

(b)Private Companies, Kampala Dealers

Individual dealers or companies owning mineral rights recognized by law can trade them. For example, ASGM mineral rights can be transferred to other acceptable entities by completing a transfer form (signed by organization signatories identified when the initial license was obtained), which is submitted to the DGSM. Typically, the license must be in good standing to be transferred. The fee to transfer a license is approximately US\$325, requiring the same daunting payment procedures (ARM 2011:13-14). At the trading centre, private companies are required to exercise “utmost integrity” and communicate the gross value of the mineral mined and or full disclosure of day-to-day trading transactions. Mining companies are expected to file “*authentic returns*” of the gross value of the mineral(s) mined to the DGSM for assessment of royalties² while dealers should maintain a transparent record of gold

DGSM include **Exploration Licence** (EL); which is an area-specific license covering up to 500 square kilometers and spans a maximum duration of seven years (initially three years and renewable for two terms of two years each). The license guarantees the right to look for minerals but not to mine. EL holders are required to relinquish 50% of their areas within the first 3 years of exploration so that the area becomes available for ASGM activities or enable other interested parties to explore the ground. EL licensee are obliged to compensate the landowner for any damages that arise in the execution of his duties. **Mineral Dealer’s Licence** (MDL) - given out to non-miners who just buy from whoever is mining (middlemen). It allows buying and selling of minerals and lasts up to end of December in the year in which the licence is granted. **Jewellers Licence** - granted for fabrication of artifacts or articles using precious minerals.

²All minerals obtained in the course of prospecting, exploration, mining and mineral beneficiations are subject to payment of royalty. The royalty is shared amongst Government (80%), Local Governments (17%) and owners or lawful occupiers of the land (3%). Presently, fiscal incentives such as zero customs duty for all mining equipment are in place but government levies

transactions, which is the basis for payment of taxes to URA. Neither DGSM nor URA have a parallel mechanism for determining the **gross value** of the mineral mined by a company or the bulk of sales of a dealer. However, in instances when the figures look ridiculously low, the DGSM or URA may send out its official to undertake on-site validation. The reliance on private companies' "records" for gross value of minerals mined to compute royalties chargeable on them by the DGSM and URA fosters cheating (in form under declaration) and or tax evasion by companies. Presently, private companies in Karamoja also play the role of acquiring **new information** on mineral endowments within the Karamoja region since the last government geo-surveys in Karamoja were done in 1964 (Rugadya *et al.*,2010). The reliance on information provided by companies -"*wise-people*"- is clear testimony of bad governance. Manipulation of such data to the advantage of private companies is indeed an incentive to making more profits, hence cannot be ruled out. Lastly, there are reports that private companies are playing the role of "*middlemen*" by way of quickly acquiring "mineral rights" for eventual sale to serious mining companies (Hinton *et al.*, 2011). Presently, these "assumed or informal roles" being undertaken by private companies is a clear demonstration that governance of the Gold supply chain from Karamoja is not transparent and accountable. Out of over 30 companies (see Annex 1) involved in the gold supply chain, only a few companies have operational gold mineral rights in Karamoja namely Anglo African Gold Mining Ltd, Moberge Finance and Uganda Gold mining Ltd.

(c)The Civil Society Organisations at national level

The current minerals policy recognizes the Uganda Chamber of Mines and Petroleum (UCMP) - the umbrella organization for private sector stakeholders (large scale mineral dealers) in mining and exploration in the country as well as ASM associations at grassroots level as being crucial in sustainable minerals development. ARM (2011) reported that under the Sustainable Management of Mineral Resource Project (SMMRP) 2004-2011, more than 20 ASM associations, three regional associations and the National Artisanal and Small Scale Miners Association (NASMA) were formed in Uganda. However, ARM (2011) was quick to add that NASMA is largely inactive while the engagement by smaller ASM associations is doubtful.

(c)Transporters

This category of actors is so far insignificant in the ASGM gold supply chain of Uganda since there are no large volumes of gold involved.

(d)URA/Customs officials

There are no current export taxes on gold from Uganda regardless of form. However, the principal taxes levied by URA, on companies and dealers in the mineral sector, are income tax on individuals and companies, VAT³ plus land rates, which are levied

a variable rate income tax that ranges from a minimum of 25% to a maximum of 45% on mining ventures which means that the level of taxation is based on the profitability of a particular mining project in the sector (Rugadya *et al.*, 2010:19)

³ VAT on exports is Zero-rated. Investors interested in export trade are however advised to register for VAT. This is helpful in that the inputs, which are used to produce the exports, might be attracting VAT. Once registered as a VAT payer, one can claim input tax and in order to claim input tax on exports, the Customs Certified copy of the Export entry must be attached to the VAT return.

by local authorities. URA levies a corporate tax on companies and other business entities (e.g., companies, partnerships and sole proprietorships). Any income come arising out of any trade, profession, vocation or adventure in the nature of trade is taxable under special rules applicable to business entities. The income of all companies accruing or derived from Uganda is taxable. A company is liable to pay tax separate from its shareholders. The sources of income of a company on which the tax can be levied include profits and gains from any business carried on for whatever period. Other sources include dividends from shares in other companies, and interest from use of the company's property. Income tax assessments for a partnership can be made either in respect to individual partners or in the partnership's name. The profits of a partnership, including a firm carrying on a trade (in this case gold trade) are taxable. A sole proprietor is taxed in the same way as an individual. Stamp duty is an indirect tax levied on a number of commercial transactions. Note that URA can only collect taxes on business entities that are URA registered, otherwise if the entity is brief case and not registered with the URA, and then URA collects no tax from such an entity. Many dealers and companies in the gold supply chain are not URA registered and hence don't pay taxes to the government.

3. Human rights violations and abuses in the ASM Gold supply chain

3.1. Introduction

Artisanal mining in Karamoja and Rupa in particular does not suffer any form of illegal taxation by some powerful actors such as chiefs, militaries, policemen, armed groups, instead the majority of human rights excesses manifest in form of human rights violations by government with a few human rights abuses. This is because in Karamoja most artisanal miners are not licensed (are extralegal and informal as opposed to illegal) and hence most of the gold is transacted through dubious channels. At most artisanal miners are unaware of legal requirements and provisions for licensing and, those that are aware would prefer to work legally but lack the level of organization and savings and technical capacity to obtain them⁴. Secondly, most areas where artisanal miners are active are already covered by exploration licences. In reality, given the climate of speculative investment and potential for resale of licences to foreign investors coupled with the “first come first serve” principle applied by the licensing agency (DGSM), these areas are immediately taken up by companies belonging to elites from Kampala and elsewhere who have better access to information. The issue of cards for artisanal diggers in Rupa is nonexistent as there is free entry and or exit but the determinant factor for entry remains loss of the

⁴ The procedures for licence acquisition are somewhat complex requiring:- A prospecting licence, which can be obtained by completing a simple application at the DGSM in Entebbe; Confirmation from DGSM in Entebbe that the area is available (not under licence already); Completion of a relatively simple application form and preparation of a Project Brief (5---10 pages addressing how and where mining will take place, environmental issues, how reclamation shall occur), and a 1:50,000 map sheet of the area i.e. most miners need assistance in preparing the application at additional cost; Endorsement of the Chief Administrative Officer (CAO) of the district where the licence area is located; A Bank Payment Advice Form (BAF) from the DGSM, requiring a return trip to Entebbe, covering mineral rent, preparation, and registration fees; Payment using the BAF at Diamond Trust Bank in Kampala, which provides a URA receipt that is taken to the MEMD Accounts division which provides another receipt; delivery of the MEMD receipt to DGSM Entebbe for recording and submission of the location licence application (ARM, 2011:14)

traditional pastoral livelihood. As already explained in section 2(ii) above, miners are locally resident people from Rupa and do not need any form of registration to involve in ASM or there is no developed mechanism by the local governments of Rupa and Moroto to require diggers to obtain “registration cards”. Otherwise, such cards would be important in monitoring the numbers of ASM diggers, for say, taxation or in case of collapsing pits, to enable local authorities to state with certainty the fatalities involved.

3.2. Violations of rights of Indigenous Peoples by the State

The most critical human rights violation by the government relate to its failure to **recognize and appreciate** artisanal miners in Rupa and the entire Karamoja communities as **Indigenous Peoples** with full rights as enshrined in Convention 169 of the ILO; the 1981 African Charter on Human and Peoples' Rights; the (legally binding) UN Covenant on Economic, Social and Cultural Rights plus General Comment No. 23 of the UN Human Rights Committee of 1994; as well as the 2007 UN's Declaration on the Rights of Indigenous Peoples. Overall, the international legal discourse enjoins a number of rights of Indigenous Peoples that require protection by the State. The international legal instruments obliges States to recognize that **Indigenous Peoples** are those peoples whose “social and economic conditions are at a less advanced stage than the stage reached by the other sections of the national community” or whose “social, cultural and economic conditions distinguish them from other sections of the national community”. The Karamojong fit this definition. These Indigenous Peoples are citizens with the same rights as others (and thus do require not more rights, as is often misinterpreted).

To put the plight of IPs in perspective, take a scenario where “development” is not premised on “neoliberal capitalist development model” which defines development in terms of “buildings and structured environments plus life styles dependent on technological advancements” to which the larger sections of Uganda’s community subscribe. Would the government wake up one day and tell this larger section of the national community that people we are breaking up your “structures and remove roads” so that we put up “Manyattas” for you because it is the internationally acceptable “modern” way of living, without “consultations and participation in good faith”? And or without paying regard to the peoples “right to land and territory”? Impossible. Why does (us majority) think that the impossible on our side should be possible on the side of minorities? Therefore, by the government of Uganda condemning the transhumant culture and lifestyle of the Karamojong IPs as backward and ordering a sedentary lifestyle for them without consultation and participation, it is a violation their human rights.

The OPM constructed understand “modern Manyattas”⁵ for Karamojong IPs along the Moroto-Nakapiriprit road before some kilometers from an army detach besides “local traditional Manyattas” hoping that the Karamojongs would occupy them but this

⁵ Manyattas; Central /temporally settlement where Women and children often stay when men are on move in search of water and pasture

has not happened. The “*modern Manyattas*” of OPM remain unoccupied. This is a gesture that **Government has violated the right of Karamoja Indigenous Peoples “to decide their own priorities for the process of development.”** Indigenous Peoples have right to develop in a different way i.e. self-determination (Article 7, C169 of the ILO). The action of the government of ordering a sedentary lifestyle for a people who have a known traditions and culture directly violates Article 21 (equality and freedom from discrimination) of the Constitution. Government based on the contemporary belief that mining stimulates economic development embarked on trading “mineral and mining rights” in Kampala over minerals in Rupa but without “*consultation and participation*” of the IPs who have lived on this land for ages. Many artisanal miners in Rupa are operating on land covered by other peoples ELs and or LLs. **The procedure prescribed by law which leaves out consultation with traditional structures of governance in Karamoja violates the right to consultation and participation (Article 15, C169, of the ILO) as well as the right to FPIC** provided in the UN Declaration on the Rights of Indigenous Peoples, the African Charter of Human and Peoples Rights and the UN Covenant on Economic, Social and Cultural Rights. Artisanal miners in Rupa just wake up and see “people foreign to the area” measuring the IPs land, taking samples and later disappearing when they done. The only relief now is that the EL and LL holders over Rupa are not enforcing their exclusive rights provided under the licenses otherwise there would been conflict already. The manner in which government trades mineral rights in Karamoja as well violates Articles 26, 36 & 37, 44 & 45 of the 1995 Constitution of the republic of Uganda. **The other violation of IP rights by government is the right to “land and territory”.** Indigenous Peoples have “ownership and possession” of the lands (territories) *and* the natural resources (including those in the sub-surface, such as minerals) from these lands (Article 14, C169 of the ILO). The 1995 Constitution, the mining law and the land law of Uganda also provide for land rights. Both the international and national laws provide for adequate compensation land upon ones land becoming unavailable because of being put to uses that otherwise don’t benefit them directly. The people in Rupa are yet to get compensation (3% of royalties) for the minerals mined from their land. *Hinton et al. (2010) observed that in 2010 the (3% royalties) share meant for landowners amounted to 15.3 million UGX was remitted to Moroto local government but was, yet, to be disbursed because the district did not know the clear landowners*. Sad but true. This means that the elitist local governments in Karamoja do not work for the good of Karamoja IPs. The Local governments “actions” loudly state that they lay claim of ownership rights over land in Karamoja region yet the land is owned communally and there are distinguished traditional structures for enforcement of the right to land and territory (see Nalule, 2010:8/9) which is well known to the local governments but ignored for obvious reasons. Human rights, then, need in this context to be locally relevant to Indigenous Peoples, as an instrument, which must offer “*efficient protection against the adverse impact of economic globalization*” (Wiliems, 2010). **Indigenous Peoples should be recognized, in the first place, as “peoples” with basic rights universally granted to every human being; but second also as peoples with specific aspirations.**

3.3. Working Conditions of Miners: Violations and Abuse of Labour rights

Absence of ASM cooperative Groups

Miners in Rupa as earlier discussed under section 2 are not organized into discernible community-based groups. ASM Grassroots groups and networks formed under SMMRP project (2004-2011) died with the winding up of the project. The “Karamoja ASGM Association” and MADEFO are inactive and ASM diggers operate independently. However, as ASM increasingly become suppliers to most EL and LL holders, there may be opportunities in future to form trade unions or artisanal diggers groups. Presently, no discernible relationship exists between the companies, local governments and ASM miners. However, ASM is characterized by child labour hence there is **abuse of children rights**. The children do not go to school because they spend the day providing labour to dig pits.

Disregard of Occupational Safety

Like earlier pointed out, ASM miners work under very dangerous conditions. There are fatalities and serious injuries whenever pit walls or underground tunnels collapse presenting an immediate concern of occupational safety in ASGM mines. ARM (2011) observed that between one and five deaths are known to occur annually while many more go unreported. Hinton *et al* (2011) observed that ASM use bare hands to handle tools like with sticks, in some cases iron rods, plastic basins and calabashes. The ASM miners walk bare feet barely dressed. The tools are not effective which makes their daily gold collection economically unproductive. The diggers are in direct contact with the mineral in this case gold but the fortunate bit is that they are not using cyanide or mercury for extraction of gold. Separation of gold is from waste minerals (tailings) is done using water in plastic basins and, in some locations, calabashes. There has been no initiative to institute preventive or corrective measures against fatalities or collapsing pit walls. Occupational safety is a responsibility of the government through its department of occupational safety and health hazards housed in the MGLSD. By government paying no attention to according ASM safety at work, is a violation of human rights and discrimination against IPs.

3.4. Violations of Social and Economic rights

Social and Economic rights provide social and economic security to a person. Social rights give people security to live together in families or communities and learn together in schools and other educational institutions. Economic rights are concerned with the protection of people’s physical survival and how they earn a living. These include access to food, shelter, education and health care. Article 40 of the republic of Uganda provides that “*every person in Uganda has a right to practice his or her profession and to carry on any lawful occupation, trade or business*”. The Article further provides that “*every worker has a right to form a trade union of his or her choice for promotion of his or her economic and social interests*”. The government has for about 30 years now, failed to guarantee the social and economic rights of the Peoples of Karamoja region provided for in the 1995 Constitution of Uganda. For example, Article 30 of the Constitution provides that all persons have a right to education. In Karamoja and Rupa ASM miners, government has failed to provide education to children, which tantamount to violation a human right. OPM (2007)

observed that Karamoja has remained by far the least literate region in the country with literacy rate at 6 percent compared to the national average standing at over 70 percent currently. **This is mainly because of the irrelevance of the current formal syllabus to the pastoral children.** Even the high hopes that the introduction of Alternative Basic Education for Karamoja (ABEK) had brought in Karamoja are long gone. At its peak, ABEK enrolment rose to 23,262 (2002) but this soon dwindled due to the infamous “*Cordon, Search and Disarm*” disarmament operations that left many children orphaned. **Powell (2010) quoting a small arms survey by Bevan (2008:16) reported that between July 2003 and August 2008 there were about 2,841 human deaths of Karamojongs at the hands of the UPDF.** The actions of the government during disarmament clearly violated (Articles 22& 24) proving for protection of right to life and respect for human dignity and protection from inhuman treatment. CPRC & DRT (2010) reiterated that Karamoja region registers the lowest enrolment rates, with a total of 115,985 pupils in the 245 primary schools, 7,158 children in the 20 secondary schools, and two tertiary institutions in the region. Therefore, children in Karamoja and for ASM miners do not have access to education. However, even when schools would be available, majority of ASM miners subject their children to child labour in the gold pits hence fail the children’s attendance of school a serious abuse of rights of children (Article 34 of the Constitution). About 42% of the rural population draws water from wells, springs and rivers, 24% obtain their water from boreholes, 10% from dams and ponds, while only 0.4% draw water from protected wells and springs. Some of the reservoirs constructed were silted severely by eroded spillways (e.g. Tutui Dam, Mogoth Parish, Rupa Sub-county, Matheniko County, Moroto District and Poroo Dam Poroo Dam, Pupu Parish, Rupa Sub-county, Matheniko County, Moroto District. 88% of the households still use the bush as a toilet facility. Household latrine coverage is very poor, the highest being of 10% in Moroto district —far below the national average of 57%. Rates of malnutrition among women and children in Karamoja are only slightly above the emergency level cut-off point of 9.8% (OPM, 2007).

The artisanal miners and the people of Karamoja do not have access to health care generally. The probability of not surviving beyond 40 years is 45.1% in Nakapiripirit and Moroto districts. HIV prevalence rate in antenatal attendees is as high as 12% in some districts due to high incidence of polygamy and widow/wife inheritance heightened killings of men during the disarmament operations by the UPDF. Note that HIV/AIDS high prevalence rate is partly blamed on rape by soldiers of the UPDF used rampant during disarmament (though isolated cases are still there) and the sex trade stimulated through the cash-based economy of ASM gold mining in Rupa. Artisanal miners and Karamojongs suffer a lot from Malaria whose prevalence stands at 48.2% (CPRC & DRT, 2010). Hinton *et al* (2011) observed that ASM miners suffer from diseases like diarrhea, worm infestations, etc. All over Karamoja and Rupa, Health service delivery is compounded by government strategy of ‘**Cordon, Search and Disarm**’, where Health Centres have also been targeted during military operations, which had undermined the confidence of the local people in utilizing services in health units (Table 1).

TABLE 1: Selected District Health indicators for Karamoja region

Indicator Level	Kaabong	Kotido	Moroto	Nakapiripirit
National				
Approved posts filled by trained staff	46.3%		38%	90%

55%	68%			
DPT3 vaccination coverage	46.5%	106%	84%	
71.8%	89%			
DPT1-3 drop-out rate	15.4%	5%	2.3%	15%
-				
Deliveries in Health units	14.4%	17.5%	14.3%	3.8%
29%				
Out-patient (OPD) utilization rate	0.49	1.2	0.9	0.55
0.9				
Household Latrine coverage	2%	2%	10%	3%
57%				

Source: OPM (2007)

Article 40 of the Constitution also covers the formation of cooperative marketing arrangements as well. This means it is a right for artisanal miners to form gold producer and or marketing cooperatives. However, in the Rupa ASM Gold supply chain, ASM digger's sell their gold individually and independent of the other miners and to whom they want. Mention should be made that dealers prefer it that way. There is no arrangement for production pooling in order to find a market collectively. Would it be possible that dealers are manipulating diggers not to form such cooperative groups? Under normal circumstances, government (central and local) should take lead in helping to mobilize and sensitize miners about the importance of such arrangements. While there were efforts to form ASM associations under SMMRP that ended in 2011, neither local government of Moroto nor DGSM have shown interest in formation of cooperative marketing boards for ASM miners. This makes the price for buying gold very varied. The dealers who buy gold from diggers who grossly lack access to information about the gold international market prices fix the price [see section 2 (iii) above]. The price changes weekly, monthly even in a single day. Note that Miners are heavily cheated in terms of determination of the weight of gold produced and price. The dealers offer very low prices compared to international price of gold at a given period. Dealers bring their own scales. Such cheating tantamount to **abuse** of "economic and social" rights of the ASM miners. Presently extortion is not possible since the gold transactions at the mining site are not regulated.

4.5 Violations and abuse of Environment, Cultural and Development rights

Environmental rights provide for a person's right to live in a safe, clean environment free of pollution and protected from destruction, right to cultural and economic development. Article 39 of the constitution provides that every Ugandan has a right to a clean and healthy environment. In Karamoja and Rupa the environment is normally a harsh one. Day to day survival is a pre-occupation for every family. Hinton *et al* (2011) observe that as people lose their tradition pastoral livelihood due to raids or drought, they are increasingly taking on Artisanal gold mining in Rupa. Matheniko - the locally resident group in Rupa lost their cattle during disarmament to the Jie and Pokot who handed in their guns last. Since then majority of Matheniko are trying to learn to live life without cattle. As such, dictates of life have pushed some to ASM mining while others are trying agriculture. The key environmental degradation associated with ASM mining are the wild cut pits. Wildcat pitting" renders livestock grazing (including free passage of human beings) impossible at ASGM sites because

of the risk of falling into pits. Therefore, there is no case of deforestation within ASM gold mines. However, elsewhere in Karamoja and Rupa, the UPDF soldiers together with local people have turned to charcoal burning. The damage is yet small but over time, all the big trees (ekorete) will be gone. *The involvement of the UPDF army officers in destruction of the environment in Karamoja is a clear case of abuse of human rights by a powerful entity.* In the mining sites like elsewhere in Karamoja, bathing and washing takes place in rivers and streams and animals drink from the same water sources with humans. No case of systematic water contamination or pollution has been reported from ASGM mining areas save for the localised contamination from washing and bathing. Mercury and Cyanide are not used for extraction of gold from Rupa and elsewhere in ASGM mines. Hinton *et al* (2010) reported that under the SMMRP, trees were given to some communities in Rupa but that these trees were not cared for. Presently, ECO is engaged in multiplication of the Ekorete tree as a measure against climate change in Nakapiripirit but no such efforts exist in Rupa gold site. The impact of ECO and other actors' tree planting activities are yet to be evaluated as it is too early to do logical evaluation.

4. Issue of Development for the benefit of neighboring communities

It is increasingly becoming explicit that the local relevance of Human rights is that their observance should create an effective protection shield of local development aspirations and cultures against the impact of economic globalization (Willems, 2010). This argument becomes even more relevant when past experience in Africa and elsewhere in the world shows that mining brings more harm than good to local livelihoods i.e. in neighbouring communities e.g. in Guatemala, Mongolia and Zimbabwe (Willems, 2010; Mtisi *et al*, 2011). Artisanal mining may not bring in as much revenue to the government treasury as large-scale mining but is most likely to benefit communities neighbouring the mining site than large-scale mining. However, the general policy direction of most African States point to belief that mining is the contemporary answer to national development. In an international symposium held in April 2010 in Australia on "Sustainable Mining" it was recommended that the mining companies and governments adopt the UN Protect, Respect and Remedy (PRR) Framework, developed by Prof. John Ruggie, the UN Secretary General's Special Representative on Business and Human rights, if mining is to benefit neighbouring communities. This PRR framework places requirements on States and business to ensure that the business activities respect and protect human rights.

Section 89 of Mining Act 2003 provides that Subject to section 100 of the, provides that all minerals obtained or mined in the course of prospecting, exploration, mining or mineral beneficiation operations shall be subject to the payment of royalties on the gross value of the minerals based on the prevailing market price of the minerals at such rates as shall be prescribed. Part 2 of the same section is to the effect that Royalty shall be shared by the Government, Local Governments and owners or lawful occupiers of land subject to mineral rights as specified in the Second Schedule to this Act. However, due to the informational nature of the ASM, benefits are only limited to the individuals involved in the mining of gold; this therefore means that the entire community is not benefiting from ASM.

5. Official Regulations of mining sector: traceability & certification

The core regulatory framework for mining in Uganda includes the Mineral Policy in 2001, the Mining Act (2003) and Mining Regulations (2004). Other legislations relevant to sustainable mining are: the National Forestry and Tree Planting Act; the National Environment Management Act; the Water Act, Cap.152; the Uganda Wildlife Act, 1986, Cap. 200; the Town and Country-Planning Act, Cap. 246; the Land Act, Cap. 227; Investment Code Act, Cap. 92; the Local Government Act, Cap. 243; the Occupational Safety and Health Act, 1997 and Labour Act. A review of Uganda mining regulatory code by the Alliance for Responsible Mining (2011:7) noted that Uganda's "*code is essentially in line with international best practice and enables Uganda to compete for investment by creating liberalized, stable, and conducive conditions*". Further analysis of the Code in terms of environmental safeguards including requirements for EIA, measures against pollution, measures to control use of cyanide and mercury, explosives, conditions for closure of mining operations showed that Uganda's mining regulatory was satisfactory (ARM, 2011: 17/8). However, the review found the processes and procedures prescribed for local community consultations and participation in mining and acquisition of mineral rights rather wanting. Analysis of the mining regulatory framework in terms of encouraging or sanctioning **traceability** and **certification** shows that presently, there is no official mechanism for traceability or for certification regarding artisanal-mined gold. However, the dealers I talked to maintained that they can tell the gold from Rupa because it is the best. Sure, "we must know to avoid being duped by unscrupulous agents" said a dealer in Moroto town.

6. Gold mineral processing units in the country

There is so far one refinery for gold in Uganda owned by Victoria Gold Star Limited. The refinery was commissioned in Kampala by the Minister for Energy and Mineral Development Hillary Oniek and the Managing Director of Victoria Gold Star, Yuri Bogorodistkiy. The gold is expected from gold mines in Busia, Buhweju, Mubende and Karamoja. The Victoria Gold Star refinery has the capacity to process at least 60 kilograms of gold a day. The company expects more than triple output subject to more supplies from elsewhere with the government's approval. The Minister said Uganda has a mineral processing protocol with the Congolese government, which it is trying to exploit by attracting investors in the mineral processing sector.

Transportation of minerals in the country

Transport of the small quantities of gold procured in Rupa form ASM is usually by land.

7. Recommendations

- a) The mining laws should be reviewed to provide for the participation of stakeholder in granting of licenses and revenue sharing.
- b) Awareness raising campaign should be strengthened to ensure sustainable mining in Kalamoja.
- c) Adopt a general policy which aims to support functioning of ASGM among the mining communities.

- d) Integrate the ASM with comprehensive mining programmes in the country;
- e) Adopt legal, scientific, technical, administrative and Financial measures necessary for the identification, protection of ASGM.
- f) Secure legal recognition of community land title and rights and responsibilities of the indigenous communities.
- g) Uganda should adopt tool kit by World Bank on Gender and extractives to cater for the equal benefit of both women and men.

8. Conclusions

It is observed that the artisanal small-scale miners' gold supply in Uganda is faced with a number of human rights injustices. The human rights injustices clearly constrain its performance, development and good governance. The most critical injustice is government's failure to recognize Karamojongs as indigenous peoples. Our considered opinion is that for mining to benefit the local communities in Karamoja; government needs first to recognize Karamojongs as Indigenous Peoples. Secondly, this recognition must be followed by a review of the current mining Code to enable protection of Karamojong IPs right to land and territory, right to consultation & participation, and the right to FPIC as is enshrined the UN Declaration on rights of Indigenous Peoples, the 1981 African Charter on Human and Peoples' Rights, etc. The performance ASM gold mining as a contributor to local development and a means of livelihood is currently constrained by human rights excess discussed, above. Sustainable mining would only be achieved when the human rights are protected. Enforcement of human rights also encourages transparency and accountability hence good governance.

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Annex 1: Companies/Dealers involved in the gold supply chain, Karamoja region /Uganda

No.	Name of company	Nature of operations/rights	Proprietor/Contact
1	Anglo African Gold Mining Ltd	Exploration license	P O Box 5480, Kampala Conrad House Jinja Road, Plot 30, fl 3 &4 Tel: +256 41 257731
2	Moberge Finance	Exploration license	
3.	Uganda Gold mining Ltd	Exploration license	
4	Hikima Investments and Technology (U) Ltd.	Exploration license for gold over a 4 sq. kms area. License expires 2012	
5	NPK Resources Ltd	Exploration license for gold over 9 sq.kms stretch. License expires 2012.	
6	Gold liners Ltd	whole sellers, distributors	Mr. Major General Victor Mazinga Nkoko Tel: 243-9977-02666
7	Alpha media certification: ISO 9001:2000	Trading Company, Distributor/Wholesaler	Ms. Nakakande Deborah
8	Masaka Precious Stones	Trading company, distributor	Mr. Mpanga Sennoga
9	Kilembe Mines	Agent	Mr Sepuya Jamil Kalanzi
10	Rogers machabire	Agent, distributor for gold nuggets	Rogers Machabire
11	Mwine Alex certification :ISO/TS 16949	Gvt commission agent, Bureau	Mr. Mwine alex Tel: 256-791-365111 / 0791365111
12	Minerals exporters ISO9001:2000 certified	Trading company	Mr. Mukasa Daniels
13	Great Lakes Mineral Centre	Trading company, distribuor	Mr. Hakim ASIMWE
14	Inter press	Trading /distributor	Mr. Kizito Siiro
15	Afrang International Trading &Investment Co.Ltd	Agent, trading company, distributor	Mr. M.Reza Alvand,G
16	Nico Exim International SPRL	Trading company	Mr. Ramadhan Odimba
17	Nantie Procurement ISO 9001:2000 certified	Trading compnay	Ms. Beti Nantie
18	AP TRADINGS LTD	Trading company	Mr. Austin Philla
19	Good Swmis Co.	Trading company	Mr. Sentogo Paul
20	Sherman HCF	Trading company	Mr. Kenneth Mugabi
21	Agosto Mineral Extractors	Agent, distributor,	Mr. AGOSTO AKEEM

		trading co.	
22	Gakou & Brothers Enterprises	Trading company	Mr. Abubakar Gakou
21	DSK Consults	Trading company	Mr. Muhammad Kizza
22	Chenimines Co. ISO 9001:2008 certified	Agent	Mwami Toussaint
23	Fabric Enterprises Limited	Trading company	Mr. Ernest Madanji
24	Kato kola	Trading company; Raw Gold	Mr John Dawirn
25	CARRIER MINER DRC CONGO	Trading company, distributor	Mr Frank Katabalwa
26	Kiprotich M Solomon	Trading company	Mr. Kiprotich Sol
27	East African Land & Sea Extractors Agency	Trading company	Mr. James Stanley Mugwanya
29	African Minerals International Co. Ltd.	Trading company for Gold dust	
30	Ssebambule Procurement Board	Trading company for Gold dust	Mr Buuzabalyawo Jacob
31	E.T.S. Kambale Vikalwe	Trading company for gold dust	Mr Lubega John
32	Best Bridge International	Trading company for gold dust	
33	Zipper Inc Uganda Ltd	Trading company for gold dust	
34	A-z Gold Supplies- Uganda	Trading company for gold dust	Mr Mpiindi Habib
35	ATP Services-Uganda	Trading company for gold dust	Mr pannuel
36	A M Minerals Inc-Uganda	Trading company for gold dust	Mr Mwanje Athuman
37	Jaina & Sons (u) Ltd	Trading company for gold dust	Mr. Deepak