



OAS | DTOC

Department against Transnational Organized Crime

ON THE TRAIL OF ILLICIT GOLD
PROCEEDS: STRENGTHENING
THE FIGHT AGAINST ILLEGAL
MINING FINANCES

SURINAME

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ON THE TRAIL OF ILLICIT GOLD PROCEEDS: STRENGTHENING THE FIGHT AGAINST ILLEGAL MINING FINANCES

Suriname's case



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Abbreviations and Acronyms

A.B.	Algemeen Besluit (General Decree)
AML/ML	Anti-Money Laundering/Money Laundering
ASGM/ASM	Artisanal and Small-scale Gold Mining/Artisanal and Small-scale Mining
CBvS	Centrale Bank van Suriname (Central Bank of Suriname)
CFT/FT	Counter Financing of Terrorism/Terrorism Financing
DNFBPs	Designated Non-Financial Businesses and Professions
EIA	Environmental Impact Assessment
EITI	Extractive Industry Transparency Initiative
FCB	Foreign Currency Board
FIU Suriname	Financial Intelligence Unit Suriname
FPIC	Free Prior Informed Consent
G.B.	Gouvernementsblad (Official Gazette)
GMD	Geologische Mijnbouwkundige Dienst (Geological and Mining Department)
GoS	Government of Suriname
IISD	International Institute for Sustainable Development
KPS	Korps Politie Suriname (Suriname Police Corps)
KSMH	Kaloti Suriname Mint House

LBMA	London Bullion Market Association
LSM	Large-Scale Mining
MIA	Minamata Initial Assessment
MNR	Ministry of Natural Resources
MOT	Meldpunt Ongebruikelijke Transacties (Notification of Unusual Transactions)
MSG	Multi-Stakeholder Group
NAP	National Action Plan
NIMOS	Nationaal Instituut voor Milieu en Ontwikkeling in Suriname (National Institute for Environment and Development in Suriname)
NRA	National Risk Assessment
OECD	Organisation for Economic Co-operation and Development
OKGS	Ordering Kleinschalige Goudsector (Coordination of the Small-scale Gold Mining Sector)
PPP	Private-Public Partnership
RBA	Risk Based Approach
RGM	Rosebel Gold Mines N.V.
S.B.	Staatsbesluit (State Decree)
SCSD	Suriname Competitiveness and Sector Diversification
UAE	United Arab Emirates
UJV	Unincorporated Joint Venture
UOKGS	Unit Ordering Kleinschalige Goudsector (Unit for Coordination of the Small-scale Gold Mining Sector)
WGC	World Gold Council

Glossary

Indigenous population	Distinct social and cultural groups that share collective ancestral ties to the lands and natural resources where they live or that they occupy, or from which they have been displaced. ¹
Garimpeiro	Small-scale gold miner originating from Brazil
Maroons	Tribal people of African descent; the descendants of persons who escaped slavery and established independent tribal communities in the forested interior of Suriname. ²

1 <https://www.worldbank.org/en/topic/indigenouspeoples>

2 <https://minorityrights.org/minorities/maroons/>

PROLOGUE

In the past few decades, the globalization process has increased the reach of transnational organized crime and illicit financing. Criminal syndicates have fueled black markets for foodstuffs, water, housing, technology, and increasingly so with the ongoing COVID-19 pandemic, fake medicines, etc. Revenues for these criminal syndicates have continued to grow, as these illicit markets keep expanding.

Many states in the Americas have had to grapple with the issue of illegal mining and with multiple associated criminal manifestations. In Colombia, illegal armed groups have been among the biggest producers and exporters of illegal gold, coltan, tungsten, as well as cocaine. In Peru, criminal syndicates—including Mexican and Colombian drug cartels—have exploited the country's large gold reserves to finance their international criminal activities. In French Guyana and Suriname, extensive networks of forced labor and child labor are tied to domestic illegal gold markets. Sexual slavery is also commonplace in the illegal mining towns, hired by criminal groups for the miners. Enslaved persons in illegal mining regions are very often migrant workers or poorer residents, working to pay off debt, or lured by promises of higher pay and benefits for their families and communities—and many often don't return.

Criminal syndicates, while they often produce the gold themselves through illegal permits, also extort small-scale mining companies and miners to produce their gold. The illegal gold is not only sold on domestic and regional markets, but also shipped to the United States, Canada, and European markets. This expansion of illegal mining—especially illegal gold mining—has destroyed and displaced communities, contaminated clean water sources, and ravaged environments and ecosystems.

This complex phenomenon is part of an increasingly large illegal gold market in Latin America, and this is reflected in the increasing percentage of these countries' gold reserves that are illegally sourced.

In the prosecution of this crime, it is considered useful to carry out an analysis and diagnosis of the phenomenon in each affected country, from different aspects, and in a country-specific manner, but without failing to identify and bear in mind similarities and patterns at the regional level. This is what we do in the Department Against Transnational Organized Crime of the Organization of American States (OAS-DTOC) within the framework of the Illegal mining project called *“On the trail of illicit gold proceeds: Strengthening the fight against illegal mining finances.”*

Illegal gold mining is also highly pervasive in Suriname which, much like its neighbors, faces great challenges addressing activities carried out by the criminal groups involved.

According to our findings, illegal mining continues to be one of the most common and quickest ways for criminal syndicates to launder funds, as it is still in high demand and under-regulated. The miners are often extorted by criminal groups, and for their businesses to survive, they pay significant sums or are coerced to engage in illegal activities under threat of violence. Often, but not always, a portion of the minerals extracted and transformed are stolen by the overseeing criminal groups.

The challenges emanating from the gold contraband and tax evasion make it even more important to strengthen the mechanisms to supervise and combat Money Laundering and Terrorism Financing (ML/FT) in Suriname.

There is a significant oversight system for these industries, although corruption and systemic issues are still present. This oversight system includes the Ministry of Natural Resources; the Gold Sector Regulation Commission (OGS); the Ministry of Labor; the Ministry of Justice and Police; the Tax Authority; the Financial Intelligence Unit; and other agencies that deal with the issues caused by illegal mining in Suriname on a daily basis, and who also contributed to this study.

As a result, we trust that this national diagnosis will serve as a useful input for the Surinamese government and other competent bodies responsible for the formulation of strategies and public policies against the actions of organized crime engaged in illegal mining and its related criminal practices.

The OAS-DTOC is able to provide valuable expertise and recommendations for effective regulation of the mining sector in Suriname and the broader region to help combat illegal mining and related criminal practices.

We are especially grateful for the support provided by Surinamese authorities—including the Mission of Suriname to the OAS; the Ministry of Natural Resources; and the Financial Intelligence Unit (MOT)—, remembering that the OAS DTOC is committed to helping the Government of Suriname to fight illegal mining in the country.

Gaston Schulmeister

Director

Department against Transnational Organized Crime

Secretariat for Multidimensional Security

Organization of American States

INTRODUCTION

Suriname is a mineral-rich country whose mining products include alumina, bauxite, oil, and gold.³ In 2022, mining products accounted for roughly 90% of Suriname's total exports. The country has a long history of gold production, beginning with small-scale artisanal extraction, and large open-pit gold-mining operations developing over the years (both medium- and large-scale). The two largest multinational companies now operating in Suriname are Canada's IAMGOLD and the United States' Newmont Corporation.⁴ Gold has been a major economic asset for Suriname for over a century.⁵ Its gold exports peaked around 1905 and tapered off steeply over most of that century, until gold production began to rise again in the 1990s.⁶ Early in that decade, Suriname saw sudden economic growth at a time when gold mining activities surpassed their earlier levels, not only in terms of the number of people involved and amount of gold produced, but also of their impacts on the natural environment, communities, and public health. Primary gold mineralization is concentrated in large swaths of the Greenstone Belt within the Guiana Shield. Much of the gold is extracted by informal small-scale gold miners. Although this informal sector accounts for most of the gold produced in Suriname, for decades now, it has been of terrific aggravation for the formulation of natural resources policy. Tax evasion, human trafficking, the illicit arms trade, deforestation, waterway pollution, and mercury poisoning are the main threats posed by small-scale mining.

One of Suriname's greatest challenges in monitoring and regulating gold mining activity is to develop a legal framework aligned with contemporary advanced mining techniques and global developments in mining. An estimated 20,000 to 35,000 people work in Suriname's mining industry, though the true figure (including informal miners) may be twice that number. Most of the workers in this sector are migrants from Brazil, referred to as *garimpeiros*, the Maroon population, who are Afro-Surinamese,⁷ and Indigenous people. But Chinese immigrant workers have recently begun to contribute to Suriname's small-scale gold mining.

3 John R. Matzko, "The Mining Industry in Suriname," *U.S. Geological Survey*, October 2017, accessed at: <https://minerals.usgs.gov/minerals/pubs/country/2014/myb3-2014-ns.pdf>

4 "IAMGOLD consolidating an emerging new gold district anchored by Rosebel," *IAMGOLD*, January 24, 2018, accessed at: <https://www.iamgold.com/English/investors/news-releases/news-releases-details/2018/IAMGOLD-Consolidating-an-Emerging-New-Gold-District-Anchored-by-Rosebel/default.aspx>

5 Kioe-A-Sen, N. M., van Bergen, M. J., Wong, T. E., and Kroonenberg, S. B. (2016). Gold deposits of Suriname: geological context, production and economic significance. *Netherlands Journal of Geosciences*, 95(4), 429-445.

6 Leontien Cremer, Judith Kolen, and Marjo de Theije, "Small-Scale Gold Mining in the Amazon: The Cases of Bolivia, Brazil, Colombia, Peru, and Suriname," *Cuadernos del CEDLA*, 2013, accessed at: 0098 http://www.cedla.uva.nl/50_publications/pdf/cuadernos/cuad26.pdf

7 Hoogbergen, W., and Kruijt, D. (2004). Gold, "Garimpeiros" and Maroons: Brazilian Migrants and Ethnic Relationships in Post-War Suriname. *Caribbean Studies*, 3-44.

The governments from 2010 to 2020 made efforts to bring transparency to Suriname’s gold production, exportation, ownership, financing, and other elements key to mapping the gold supply chain and possible illicit activities in that sector. The Extractive Industry Transparency Initiative (EITI) was launched in 2016. Suriname has joined the EITI process and the current administration continues to participate in it. According to 2016 and 2017 EITI reporting, Suriname had made good progress in building transparency. The EITI Board decided the following: “Following the conclusion of Suriname’s Validation, the EITI Board agrees that Suriname has made meaningful progress overall in implementing the 2016 EITI Standard.”⁸

In September 2020, a study on beneficial ownership was released (the findings of which are used in screening applicants for mining rights) and the institutional strengthening of the Ministry of Natural Resources (MNR). Based on the Board’s decision, the recommendations for improvement are to be implemented by early April 2023. These refer to implementing corrective actions for government engagement (Requirement 1.1), industry engagement (Requirement 1.2), [Multi-Stakeholder Group] MSG oversight (Requirement 1.4), work plan (Requirement 1.5), contract and license allocations (Requirement 2.2), register of licenses (Requirement 2.3), contracts (Requirement 2.4), beneficial ownership (Requirement 2.5), state participation (Requirement 2.6), comprehensive disclosure of taxes and revenues (Requirement 4.1), sale of the state’s share of production or other revenues collected in kind (Requirement 4.2), transactions related to state-owned enterprises (Requirement 4.5), data quality and assurance (Requirement 4.9), social expenditures (Requirement 6.1), quasi-fiscal expenditures (Requirement 6.2), contribution of the extractive sector to the economy (Requirement 6.3), public debate (Requirement 7.1), data accessibility (Requirement 7.3), and review of outcomes and impacts of EITI implementation (Requirement 7.4).⁹ The reports for 2018 to 2020 are being prepared by a consultancy agency on behalf of the Ministry of Natural Resources, and are scheduled for publication in the last quarter of 2022.

Several literature sources have indicated that in some cases gold is trafficked with the acquiescence of at least some border authorities. The assumption is that gold flows illicitly into Suriname from Guyana. This can be explained in part by Suriname’s and Guyana’s tax and royalty structures. Those of Suriname are more favorable to miners than those of Guyana. On January 1, 2022, the royalty rate in Suriname rose from 2.75% to 4.5%.¹⁰ However, mining industry sources in both Suriname and Guyana have indicated that when tax incentives in either country change, gold flows can rapidly shift to the country the taxes are lower. The current royalty rate in Guyana is 8%.¹¹ In neighboring country French Guiana, it is 1.8%¹² and in Brazil, it is 1.5%.¹³ Suriname’s long, porous international borders, especially with Brazil and French Guiana, also create

8 Board decision on the Validation of Suriname; Decision reference: 2021-23/BC-305, 31 March 2021.

9 Board decision on the Validation of Suriname; Decision reference: 2021-23/BC-305, 31 March 2021.

10 Staatsbesluit van 31 december 2021, houdende nadere wijziging van het Besluit Royalty Klein mijnbouw ter zake van Goud en Exploitatie Bouwmaterialen (S.B. 1989 no. 40, zoals gewijzigd bij S.B. 2021 no.12), (S.B. 2021 no. 177).

11 [Montagne d’Or project in French Guiana: economic positioning and alternative techniques to the extraction of gold from ore by cyanidation | BRGM](#)

12 [Montagne d’Or project in French Guiana: economic positioning and alternative techniques to the extraction of gold from ore by cyanidation | BRGM](#)

13 [Changes To The CFEM, The Brazilian Mining Royalty - Mining - Brazil \(mondaq.com\)](#)

favorable conditions for illicit gold trafficking practices, even though royalty rates in Suriname are higher than in those two countries. Sources in the gold trade sector indicate that regulations on the gold trade in Brazil and French Guiana are more rigidly implemented and enforced than they are in Suriname, which may be another reason why gold is smuggled into Suriname from its neighboring countries.

In July 2020, a new administration headed by H.E. Chandrikapersad Santokhi assumed office and promised to reform the system, a top priority of which would be tackling the illicit gold trade. The Santokhi administration has made some progress in this area.

Although the lack of statistics and reliable data on Suriname's gold trade has negatively impacted policy-building and decision-making, redesigning the geological database to build transparency and provide reliable data is a necessary and priority policy task for the current administration. The redesign of the geological database will be a core task of the Geological and Mining Department (GMD), to be integrated into the Mineral Institute, now being created under the Suriname Competitiveness and Sector Diversification (SCSD) project financed by World Bank.

LEGAL AND POLICY FRAMEWORK

The 1987 Constitution of Suriname establishes the legal framework for the mining sector. Its Article 40 provides that in order to promote socio-economic development towards a socially just society, a development plan shall be established by law, taking into account the national and socio-economic objectives of the State.

Under Article 41, natural riches and resources are the property of the nation and should be used in economic, social and cultural development. The nation has the inalienable right to take full possession of the natural resources and to use them for the economic, social and cultural development of Suriname. As part of national legislative development, Suriname has issued the following regulations for combating illicit gold mining:

- Anti-Smuggling Act (S.B. 1986 no. 3, as most recently amended by S.B. 1990 no.54).
- Companies and Professions Act (S.B. 2017 no. 40).
- Mining Act (S.B. 1986 no. 28, as most recently amended by S.B. 1997 no. 44).
- Economic Offences Act (S.B. 1986 no. 2, as most recently amended by S.B. 2002 no. 67).

Although a legal framework for gold mining is in place in Suriname, it is not very robust and is outdated as well. It was enacted in 1986, when the Suriname Mining Code was established.¹⁴

¹⁴ Leontien Cremer, Judith Kolen, and Marjo de Theije, *Ibid.*



Mined out area, where no rehabilitation has taken place, Brownsberg area / Source: OKGS.

The primary entities mandated to regulate and oversee Suriname's mining sector are:

- The Ministry of Natural Resources (MNR), which monitors the effective and efficient management of all minerals (excluding hydrocarbons), coordinates national and international mining policy, and seeks to ensure sustainable and maximum benefits for the State of Suriname and its citizens. In its efforts, the MNR is supported by:
 - The Geological and Mining Department (GMD), responsible for managing concessions, generating and distributing geological information, and conducting surveys.
 - The Unit for Coordination of the Small-scale Gold Mining Sector (UOKGS), established to register small-scale miners, mining operations locations, and relevant mining equipment, with the aim of restoring governmental authority over the sector, improving its environmental performance, and recovering tax income.

- The Gold Sector Regulation Commission (OGS), created in 2011 as a presidential commission reporting to the MNR, had primary responsibility for preparing an inventory of the gold sector with the aim of developing a more integrated policy in that sector.¹⁵ The Commission was a multi-disciplinary entity that included the Police, the Army, the Tax Agency, the Central Intelligence and Security Services, the Ministry of Labor, Employment and Youth Affairs, the Geological Mining Department, and the Public Health Agency.¹⁶ Its primary goals included seeking to register previously unregistered miners and expelling small-scale operations from areas of conflict. In practice, the Commission was not effective since funding and resources were not nearly sufficient to regulate an industry primarily composed of small-scale immigrant miners and local miners from neighboring communities. In September 2020, the OGS was reinstated as a commission under the administration of the Vice-President of Suriname, and is now the Commission for the Coordination of the Small-scale Gold Mining Sector (OKGS). The technical working unit of the OKGS (UOKGS) remained under the MNR. In that month, various actions were taken by the current administration, such as issuing state decrees on the registration of small scale-miners and equipment¹⁷ and adjustment of royalties.¹⁸
- Small-scale mining is a sector for which public policy formulation is increasingly needed, especially for natural resource protection. Examples of aspects where it is needed include controlling activities in the far interior and along Suriname’s porous national borders, financial resource mobilization, and legislation enforcement capacity. In 2021, a state decree was issued for the development of an inventory and registration of those active in small-scale mining and their mining equipment. This database will be used during a three-year transition period for the formalization of actors working illegally in the sector, while gradually instituting the criminalization of illegal mining by both Surinamese and migrant miners. After the transition period, illegal mining will become a criminal offense. During this coordination, joint efforts will be made with the tax authorities, the Ministry of Justice and Police, the Ministry of Spatial Planning and Environment, and the Ministry of Labor, Employment and Youth Affairs, and, where necessary, other ministries and institutions, to achieve an integrated approach to problems in the areas of taxation, safety and security, environmental degradation, lawful citizenship, and labor.
- The GMD is the primary administrative body with responsibility for providing guidance and issuing applications for miners’ licenses. The Mining Code also addresses the rights of indigenous and Maroon peoples.¹⁹ However, a study by the International Institute for Sustainable Development (IISD) found that this legislation needed to be updated, since it is based on a legal framework developed when many of today’s mining conditions did not exist.

15 John Johans, “Presentation of the Gold Commission (OGS),” created October 21, 2020, and provided by the OGS to the OAS.

16 “Commissie Ordening Goudsector,” accessed at: <http://www.gov.sr/themas/veiligheid-en-orde/ordening-goudsector-ogs/>

17 Staatsbesluit van 28 oktober 2021 ter uitvoering van artikel 3 van het decreet mijnbouw ((S.B. 1986 no. 82, zoals gewijzigd bij S.B. 1997 no. 44 (Besluit inventarisatie kleinschalige goudsector)), (S.B. 2021 no. 151).

18 Staatsbesluit van 31 december 2021, houdende nadere wijziging van het Besluit Royalty Klein mijnbouw ter zake van Goud en Exploitatie Bouwmaterialen (S.B. 1989 no. 40, zoals gewijzigd bij S.B. 2021 no.12), (S.B. 2021 no. 177).

19 Leontien Cremer, Judith Kolen, and Marjo de Theije, *Ibid.*

This lack of an adequate legal and regulatory framework was highlighted in a 2019 World Bank study which found that:

- Lacunae exist in the regulatory framework where it should cover the management of the environmental and social impacts of economic activities, creating risks for sustainable development and for new private investors. For mining, this creates risks of deforestation of the country's vast forest (over 90% of national territory) stemming from illegal gold mining, as well as the widespread contaminative use of mercury for gold extraction by artisanal and small-scale miners.
- Some Indigenous and Maroon populations live in areas with mineral potential, and, as a result, land rights conflicts over informal mining operations often arise. Lack of transparency and capacity to monitor and enforce environmental and social regulations can encourage a race to the bottom across sectors.

In July 2020, a Community and Engagement Unit was established within the MNR to provide guidance for community engagement in natural resource development. In view of the developments in the mining sector, the environment and the rights of local communities should be taken into account in decision-making processes for the issuance of concessions, in keeping with the principle of Free Prior Informed Consent (FPIC). The State recognizes its duties to society in its pursuance of a transparent policy. Mining rights are currently issued with the consent of the local communities, whereby those with rights to mine gold, other minerals, and building materials are being encouraged to make a clear contribution to the development of the surrounding area. Mediation is employed as much as possible to resolve many lingering conflicts between communities and mining rights holders.

The 1986 decree in force that governs the mining sector has not been supplemented by regulations for its implementation (state decrees). Institutional capacity to monitor the sector and enforce laws and regulations is insufficient owing to Suriname's social, economic, and geographical characteristics. For example, the Geological Mining Department (GMD), with responsibility for monitoring licenses, has only a few highly-trained and experienced geologists. These challenges in gold sector regulation and monitoring contribute to the Government of Suriname's limited capacity to generate revenue from the sector.²⁰ Government figures on budgetary matters are not publicly available. And, as mentioned above, geological data is outdated or inaccessible and there are significant gaps in mine closure information. Also, the current legal framework cannot be adapted to today's mining activities and practices. Data-sharing and management is extremely challenging, especially for activities to improve monitoring and enforcement from a law enforcement or justice standpoint. In 2002, the Association of Geologists made efforts to update the legislation. Later, various efforts were made to update mining protocols. The SCSD project, financed by the World Bank, is the most recent initiative for updating the mining decree and protocols and creating a Mineral Institute. This project was approved in 2019, and is now in execution. Its objective is to provide support for strengthening

²⁰ International Bank for Reconstruction and Development Project Appraisal Document, Republic of Suriname, The World Bank Group, June 14, 2019.

governance, transparency, and accountability in the mining sector by improving the legal, regulatory, and institutional framework for mining. As of May 2022, a draft mining decree and a draft mineral agreement had been prepared.

Suriname's legal and regulatory framework also has provisions for the fight against money laundering and/or illicit activities for the financing of gold mining.

Regulations in place to monitor financial flows in the gold mining sector in Suriname are:

- Foreign Currency Exchange Regulations 1947 (*Deviezenregeling 1947*)(G.B 1947 no. 136, as most recently amended by S.B. 1984 no. 104).
- Notification of Unusual Transactions Act 2012 (“*wet MOT 2012*”) (S.B. 2002 no. 65, as most recently amended by S.B. 2012 no. 133).
- Order for Indicators of Unusual Transactions (*Besluit Indicatoren Ongebruikelijke Transacties*) (S.B. 2002 no. 65, as most recently amended by S.B. 2003 no. 45).
- Money Laundering Criminalization Act (S.B. 2002 no.64).

Based on Articles 1, 5, and 11 of the “*Deviezenregeling 1947*” [Foreign Currency Exchange Regulations 1947], the Foreign Currency Board (FCB)'s monitoring unit prepared Express General Order no. 223, “Conditions for granting a gold buying and export license.” The preamble section of this order provides: “That in connection with the further organization of the gold sector in Suriname, and guaranteeing access for Surinamese gold to the international market, it is necessary to promote adherence to internationally applied guidelines, including the London Bullion Market Association (LBMA), Responsible Gold Guidance and the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.”²¹

The National Risk Assessment 2019-2020 reports the following information: In the gold sector, stakeholders believe that companies are vulnerable to the threat of smuggling because of companies' purchasing policies. In their compliance programs, companies try to mitigate the risk of this threat by means of the 'know your supplier' principle. However, this principle is not always conclusive.

Small-scale gold companies do not have compliance programs. Information from stakeholders in the small-scale gold sector indicates that money laundering, corruption, tax evasion, human trafficking, and the illegal arms trade are the main threats. Of these, money laundering is the most important because the gold sector is capital-intensive with a high need for regular capital injections for capital goods and consumables. The poor/lack of supervision by Anti-Money Laundering/Counter Terrorism Financing (AML/CFT) regulators

²¹ A.B. no. 223 Onderwerp: Voorwaarden voor het verlenen van een goudopkoop- en exportvergunning.

can lead to misuse of this sector to eliminate or launder proceeds from illicit activities or tax evasion. The circulation of huge amounts of money with inadequate or absent control can put pressure on political and administrative institutions and processes.²²

LEGAL FRAMEWORK. FINANCIAL INTELLIGENCE UNIT (FIU) SURINAME

The main tasks of FIU Suriname are set forth in Article 2.2 of the Unusual Transactions Reporting Act (S.B. 2002 no. 65, as most recently amended by S.B. 2012 no. 133, referred to as the MOT Act), namely: the collection, registration, processing, and analysis of unusual transactions, in order to determine whether this data may be useful in preventing and detecting Money Laundering and Terrorism Financing.

The Money Laundering Criminalization Act (S.B. 2002, no. 64) was introduced in 2002. With its coming into force, measures have been taken to combat and sanction money laundering or laundering of the proceeds of crime. Money laundering can be defined as moving (unnoticed) and/or bringing into the legal payment system income (assets) obtained from any crime, and subsequently ascribing a lawful use to that income, disguising its illicit origin. The ultimate objective of FIU Suriname is to protect the integrity of Suriname's financial system.

UNUSUAL TRANSACTION REPORTING OBLIGATION

Article 1 of the MOT Act stipulates the non-financial services specifically subject to reporting, namely:

“Trading in gold and other precious metals, and gemstones, by a natural person, legal entity, or company that professionally or commercially trades in precious metals, gemstones, and jewelry, in case of financial transactions that equal or exceed the amounts fixed in the Indicators of Unusual Transactions Decree.”

All related financial transactions equaling or exceeding the stipulated amounts are classified as Unusual Transactions and must be reported to the FIU Suriname as an Unusual Transaction based on an objective or subjective indication, based on the assessed inherent risks for ML/TF [money laundering/terrorism financing] (Risk Based Approach, RBA).

²² Nationale Risico Analyse 2019- medio 2020-Publieke versie, pp. 68-69.



Mission OKGS regarding evacuation of gold miners nearby auxiliary dams, Dam 10, Stuwmeer area/ Source: OKGS.

SUPERVISION OF DESIGNATED NON-FINANCIAL BUSINESSES AND PROFESSIONS (DNFBPS)

Pursuant to Article 22 of the MOT Act, FIU Suriname is also designated as AML/CFT Supervisor of the DNFBPs (which includes actors in the gold sector). Supervision focuses on compliance with and enforcement of the obligations that are mandatory and crucial in combating ML/TF effectively. FIU Suriname, as the supervising authority, has the authority to issue directives to the service providers under its supervision in order to promote compliance with this Act and relevant Regulations and Guidelines. These DNFBPs are subdivided into various categories, as included in the Decree on Indicators of Unusual Transactions. The actors in the gold sector are included in category F (traders in gold, other precious metals, and gemstones).

Mining sector-related reporting institutions and DNFBPs in Suriname include:

- The National Institute for Environment and Development in Suriname (NIMOS).
- Mining companies (small-scale and large-scale companies).
- Dealers in jewelry, precious metals, and gemstones.
- Gold traders.
- Manufacturers and traders of explosives.
- Loan and pawn companies with collaterals and currency exchange offices.

- Companies that distribute, transport, and/or trade chemical products that can be used in (illegal) mining.
- Companies engaged in commerce in specific classifications of machines and equipment, including heavy machinery used in mining activities.
- Cash transport, custody, and management companies.
- Laboratories and businesses that produce and commercialize chemicals used in the production of gold.

NIMOS was established to achieve national environmental legislation in its broadest sense, prepare and implement environmental protection legislation, and coordinate and monitor compliance.

Regulations to combat environmental crimes arising from illegal gold mining:

- Environmental Law (S.B. 2020, no 97).
- Minamata Convention on Mercury (Law of March 16, 2018, ratifying the treaty “Minamata Convention on Mercury”) (S.B. 2018 no. 30).

In 2013, NIMOS became the lead institute for legal and institutional analysis of the current situation of mercury use in Suriname and the role of the various actors. NIMOS prepared the Surinamese State and all stakeholders for the implementation of the Minamata Convention on Mercury at the national level.²³ In 2014, the Minamata Advisory Document was issued, providing a full overview of Suriname’s legal instruments related to mercury importation, exportation, and use, as well as production processes where mercury may be released (e.g. gold buying houses).

The Minamata Convention on Mercury, adopted in 2013, is a multilateral environmental agreement that addresses specific human activities that are contributing to widespread mercury pollution, such as mercury mining, the use of mercury in production processes, and the mercury trade. It entered into force in August 2017 and Suriname ratified it in October 2018.

A 2019 inventory report on mercury releases found that: “In Suriname current legislation regarding use, import, export and handling of mercury is non-existent and a comprehensive law needs to be developed to address this.”²⁴

²³ <https://nimos.org/en/portfolio/minamata-project/>

²⁴ Political Ecology of Mercury – Suriname SRJS a strategic partnership between IUCN NL, WWF NL and the Netherlands Ministry of Foreign Affairs, 2019.

For Suriname, one of the important obligations under the Minamata Convention is to formulate a National Action Plan (NAP) for Artisanal and Small-Scale Gold Mining (ASGM). NIMOS is currently developing the National Action Plan for this area.

Artisanal and Small-Scale Gold Mining (ASGM) has traditionally been a source of income for parts of the community, but mercury's negative impact on human health and the environment in Suriname cannot be overlooked and needs to be addressed. The Mercury Initial Assessment (MIA 2020) provides baseline knowledge of the mercury issue as a whole (including the technical, legal, regulatory, social, and gender mainstreaming aspects) for the implementation of the Convention.

At present, Suriname has no legal framework on mercury. Unauthorized mercury is subject to seizure by the authorities and the imposition of fines. As for environmental pollution, Suriname has the Environmental Law and the Penal Code for the prosecution of offenders.

THE GOLD SUPPLY CHAIN IN SURINAME

Very little information is available on the phases of Suriname's licit and/or illicit gold supply chain and very little has been obtained through traditional research. Observations by different public and private actors underscore the need for consolidated data on the gold production chain as a whole, issued by an agency with responsibility for compiling it from the different actors, processing it, and making it available to all stakeholders, the academy community, and the general public. Not only would this contribute to a better understanding of the sector, but would also lend transparency to this economic activity. In 2022, the country report was drafted and further updated with information on processes, provided by the Government of Suriname.

MINING PERMITS

Mining permits may be obtained and are required for reconnaissance, exploration, exploitation, small-scale mining, and the mining of building materials. Each such permit has reporting requirements that are outlined in the Mining Decree. Reporting is to be made on a quarterly or annual basis (depending on report content) and information is required on activities, production levels, and possible and probable reserves, with maps, geological data, levies and taxes paid and payable, investments, and number of employees (including nationality, age and wages paid). The Mining Decree covers most of the mine life cycle, although there are lacunae where it should specify details of mine closure and post-closure rehabilitation. It should also be noted that Environmental Impact Assessment (EIA) guidelines on mining address all phases of the mining cycle.

There are five main categories of and steps for issuing mining permits and licenses. Mining rights categories for small/medium operations differ from those for large-scale operations. A 2017 study produced for

the Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development, funded by Government of Canada, listed the steps and terms as follows:²⁵

Figure 1: Categories for Mining Rights

Mining right					
	Reconnaissance	Exploration	Exploitation	Small-scale mining	Building materials
Term	Two years	Three years	25 years	Two years	Five years
Renewable	Yes, one-year extension possible	Yes: Two-year renewals, can do twice. Area covered by the right reduced by 25 per cent with each renewal.	Yes, can be extended for up to 25 years	Yes, renewable for two-year periods	Yes, renewable for periods of up to five years
Maximum size	200,000 ha	40,000 ha	10,000 ha	200 ha	400 ha
Transferable	No	Yes	Yes	No	Yes
Requirements and obligations	<ul style="list-style-type: none"> • Quarterly reports • Notification of discoveries • Annual reports • Final report 	<ul style="list-style-type: none"> • Detailed workplan • Proof of bank deposit or bank guarantee to cover expected costs for first period of the right • Start within three months • Follow work program • No breaks in activities longer than four months • Detailed workplan submitted each year • Notification of discoveries • Minimum spend • Complete and accurate records • No commercial production • Quarterly and annual reports 	<ul style="list-style-type: none"> • Application must include: program with schedule; total expected revenue; production capacity to be installed; estimate of investment capital; local goods and services used; training and knowledge transfer to Surinamese nationals; and program for rehabilitation. • Timely start • Annual estimate of coming production, exports, levies, import requirements • Reports of technical and financial data • Annual report on reserves • Quarterly reports on activities • Annual report 	<ul style="list-style-type: none"> • Quarterly report on invested capital, operating cost, number of workers (by age, nationality), tonnage of earth moved and minerals mined • Pay required levies 	<ul style="list-style-type: none"> • Post-mining rehabilitation plan • Quarterly reports on progress and results of exploration • Notification of intent to start quarrying • Keep daily records of quantities produced • Quarterly reports on exploitation • Annual report, with estimate of activities for coming year • Measures to protect ecosystems and occupation health and safety

(Source: Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development).

²⁵ “IGF Mining Policy Framework Assessment: Suriname,” Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development,” May 2017, accessed at: <https://www.iisd.org/system/files/publications/suriname-mining-policy-framework-assessment-en.pdf>

MINING PROCESSING

While the Artisanal and Small-scale Gold Mining (ASGM) sector supports many, often poor families, small-scale gold mining also has harmful impacts on the natural environment and human health due to, among others, miners' use of mercury in the gold extraction process. Mercury amalgamates with gold, and is easy, cheap, and effective to use in gold extraction. Mercury can be used at different stages of the mining process and, depending on the method, different amounts of mercury are needed. Most Surinamese gold miners do not use mercury in closed circuits but rather heat it to its evaporation point. Several reports mention the growing mercury pollution of Suriname's waterways. For instance, a 2003 report estimated that for every kilogram of gold extracted, one kilogram of mercury had entered Suriname's water stream.²⁶ By extrapolation, at least 20,000 kilograms of mercury have entered Suriname's river system for at least the last two decades. In addition, because the mercury is mixed with ore by hand and then burned off into the atmosphere, and miners use no protective equipment, it poses a major health hazard to them.

MERCURY USE IN THE GOLD MINING PROCESS

Despite the tons of mercury used in Suriname over the last 20 years, there are no official records of any mercury imports since 2003. Yet almost all small-scale miners use mercury in gold extraction.²⁷ The existing national legislation on the importation, use, exportation, and handling of mercury is inadequate. A restriction on mercury importation making it subject to authorization is in place. Since no importation authorization has been granted since 2004, it is likely that all mercury used in ASM enters the Suriname market illegally.

Apparently, most of the mercury used in Suriname has been illicitly trafficked from neighboring Guyana, primarily over land, by water, or flown on small aircraft to informal airstrips in Suriname. Smugglers are likely small-scale individual informal traders who buy repacked flasks or plastic bottles containing mercury either just across the border with Guyana or in the border district of Nickerie. These traders resell smaller amounts of mercury in Paramaribo, where gold miners buy their supplies. A second likely source of the elemental mercury used in ASM is China²⁸ (Figure 2). In this case, mercury would be imported from China

26 Hilson, G.M. (Ed.). (2003). *The Socio-Economic Impacts of Artisanal and Small-Scale Mining in Developing Countries* (1st ed.). CRC Press. Chapter 36, Challenges to Sustainable Small-Scale Mine Development in Suriname, Marieke Heemskerk, and Rachael Van der Kooye, 2003, accessed at <https://doi.org/10.1201/9780203971284>.

27 Barbara Hendus, et al., 2016. *Opening the Black Box: Local Insights into the Formal and Informal Global Mercury Trade Revealed*, accessed at: https://www.iucn.nl/app/uploads/2021/07/lr_mercury_brochure_digitaal_gebruik.pdf

28 *Political Ecology of Mercury – Suriname SRJS a strategic partnership between IUCN NL, WWF NL and the Netherlands Ministry of Foreign Affairs*, 2019.

on container ships bringing in other goods, such as mining equipment. No such shipment has ever been intercepted by official in Suriname’s harbor.²⁹ In both Paramaribo and the gold fields of Suriname’s interior, mercury is sold in shops catering to ASM miners that are owned by Chinese nationals.³⁰

Figure 2: Illicit mercury trafficking routes in Suriname

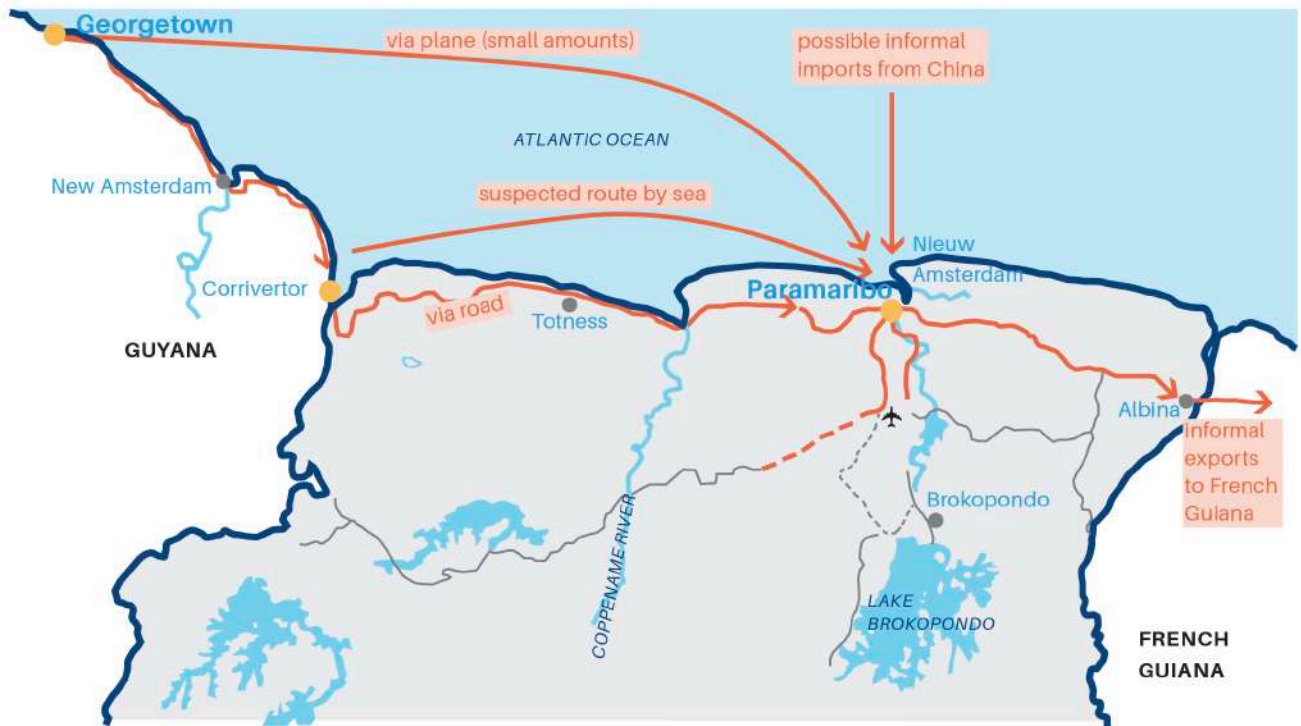


Figure 6: Map of main mercury trade routes in Suriname

- Main trading hub
- Main transport route
- - - Transport distributing mercury to ASGM areas

(Source: Barbara Hendus, et al., 2016).

²⁹ Barbara Hendus, et al., *Ibid.*

³⁰ Political Ecology of Mercury – Suriname SRJS a strategic partnership between IUCN NL, WWF NL and the Netherlands Ministry of Foreign Affairs, 2019.

This means that mercury is sold in Suriname outside of lawful custody chains. The labor law states that employees may not be exposed to “harmful gases and fumes”. Thus far, no employee has ever been compensated for illness caused by working with mercury, and no firms have ever been sanctioned for exposing employees to mercury vapor. Enforcement of compliance with mercury importation and transport laws is the responsibility of the Suriname Police Corps (KPS), the Coast Guard Authority Suriname, and the Suriname Customs Department. None of these authorities specifically focuses on mercury smuggling, but they seize mercury if it is found during contraband control. To date, no official records exist of seizures of illicit mercury shipments into Suriname, likely because it enters in minimal hard-to-detect quantities, enters in remote areas where activities are difficult to control, or is hidden in other shipments.

REFINING

In 2015, Kaloti Suriname Mint House (KSMH) opened its doors to serve as Suriname’s primary refinery, and, at its inauguration, senior Surinamese government officials described it as the largest gold refinery in the Western Hemisphere.³¹ The company is a joint enterprise between the Kaloti gold conglomerate of the United Arab Emirates (60%), the Surinamese government (10%), and the local gold dealers (30%). However, Kaloti does not actually refine gold, which calls into question their declared refining capacity of 60 tons of gold per year.

The gold that moves through Kaloti Suriname is likely refined in Dubai, United Arab Emirates, the headquarters of Kaloti’s global gold purchasing and gold refining operations.³² In 2017, the last administration granted KSMH sole authority to refine and export gold with the exception of the two big companies (IAMGOLD and Newmont), which resulted in a 10-fold increase in gold exports from Suriname to the UAE.³³

31 “EITI Report of the Republic of Suriname: Report on the Extractive Industries Transparency Initiative for the fiscal year ending December 31, 2016,”.

32 “Golden Detour: the hidden face of the gold trade between the United Arab Emirates and Switzerland,” *SwissAid*, July 10, 2020, accessed at: https://swissaid.kinsta.cloud/wp-content/uploads/2020/07/SWISSAID-Goldstudie-EN_final-web.pdf

33 UN Comtrade. [New York]: *United Nations*.



Expedition Avanavero area, carried out by ADEKUS in collaboration with Geologisch Mijnbouwkundige Dienst (GMD) with the aim of rock sampling of the Matapi, Ston and Dalbana formations/Source: GMD/MNR-Communications.

DECLARING AND PURCHASING

Historically, the Central Bank of Suriname (CBvS) has been the entity charged with purchasing and declaring gold produced in the country.³⁴ As noted, in 2016, the Government decreed that KSMH would be responsible for purchasing, assaying, and refining the gold for export outside of IAMGOLD and Newmont. However, Kaloti recently released a statement saying that it does not buy or sell gold.³⁵ Customs data from 2012 to 2021 include no data on gold exports by the Kaloti Mint House.

The amount of gold produced by the major multinational companies must be reported to the CBvS, as established in Suriname's legal framework on mining. A report by the Global Initiative on Transnational Organized Crime found that the market for gold in Suriname is likely inflated, since Suriname has less

³⁴ Farah interviews with gold sector members, July 2016; Farah interview with B. Ebus, May 20, 2020

³⁵ "Golden Detour: the hidden face of the gold trade between the United Arab Emirates and Switzerland," Ibid.



Expedition Avanavero area, carried out by ADEKUS in collaboration with Geologisch Mijnbouwkundige Dienst (GMD) with the aim of rock sampling of the Matapi, Ston and Dalbana formations/Source: GMD/MNR-Communications.

stringent certification processes than its neighbors in the region. This means that in addition to the gold produced and declared in Suriname, gold miners from nearby countries are also seeking to declare and sell gold in Suriname.

EXPORTATION

Suriname has one of the lowest gold export tax rates in the region. Paramaribo only requires a 1.25% tax on gold exported from Suriname.³⁶ Therefore, gold from nearby countries, including Guyana, French Guiana, Brazil, and even Venezuela, is likely trafficked into Suriname and then exported as if it were sourced from Suriname.

³⁶ “Golden Detour: the hidden face of the gold trade between the United Arab Emirates and Switzerland,” Ibid.

According to a recent report commissioned by SwissAid, in 2018, the UAE imported over 11 tons of gold from Suriname.³⁷ According to UN Comtrade data, Switzerland and Belgium are often two other destinations for gold produced in Suriname.

There are also indicators that more gold is produced in Suriname than gold export figures suggest. In 2018, Suriname officially reported the exportation of 40.67 tons of gold, while sources in the gold industry said the amount of gold actually produced was closer to 42 tons.³⁸ This discrepancy may be explained by the use of gold as a means of payment in the interior, the trade and processing of part of the gold on the local market (e.g. jewelers), or possibly the keeping of it in reserve while awaiting more favorable market conditions.

37 “Golden Detour: the hidden face of the gold trade between the United Arab Emirates and Switzerland,” Ibid.

38 Farah interviews with gold sector members, July 2016; Farah interview with B. Ebus, May 20, 2020.

GOLD MINING SECTOR DATA ANALYSIS

GOLD PRODUCTION

While Suriname's total annual gold production figures do not nearly approximate those of many of the world's larger countries, such as South Africa, China, Russia, or Peru, in 2015, it was the 10th largest producer of gold, based on its relative country size.³⁹ In other words, Suriname exports about 1% of the world's gold but only has 0.007% of the world's population.

According to a REDD+ for the Guiana Shield regional collaborative study on gold mining, in 2014, Suriname's deforested area had grown to nearly twice that of 2008. In 2014, 53,668 hectares of deforested area in Suriname were attributed to active gold mining operations.⁴⁰ Since that year, the deforested area has continued to expand, this posing a major threat for the maintenance of Suriname's carbon-zero status.

Artisanal and small-scale gold mining (ASGM) is widespread in Suriname, particularly in its interior. Until 2017, it accounted for about 60% of Suriname's total gold production and estimates put the number of its workers at 40,000.⁴¹ From 2016 to 2017, the situation changed, when an estimated one third to one half of gold came to be produced by the large-scale gold mining sector.⁴² This is because Newmont Mining first produced gold on a commercial scale in the last quarter of 2016.

39 "Amazon Gold Rush: Gold Mining in Suriname," *Amazon Team*, 2015 – Worldwide gold mining production, accessed at: <https://www.amazonteam.org/maps/suriname-gold/>

40 <https://news.mongabay.com/2015/10/gold-mining-explodes-in-suriname-puts-forests-and-people-at-risk/>

41 <https://www.iisd.org/system/files/publications/suriname-mining-policy-framework-assessment-en.pdf>

42 Barbara Hendus, et al., *Ibid.*

Table 1: Overview of Surinamese Gold Production Statistics from 2012 to 2021

GOLD PRODUCTION		2012	2013	2014	2015	2016	2017	2018	2019*	2020*	2021*
Gold sector as % of GDP		14	10	8	7	11	16	11			
Large-scale gold Mining	x 1000 kg	13	11	11	9	13	26	26	25	22	19
Small-scale gold Mining		22	23	20	17	14	15	16	16	14	14
Total gold production		35	34	31	26	27	41	42	41	36	33

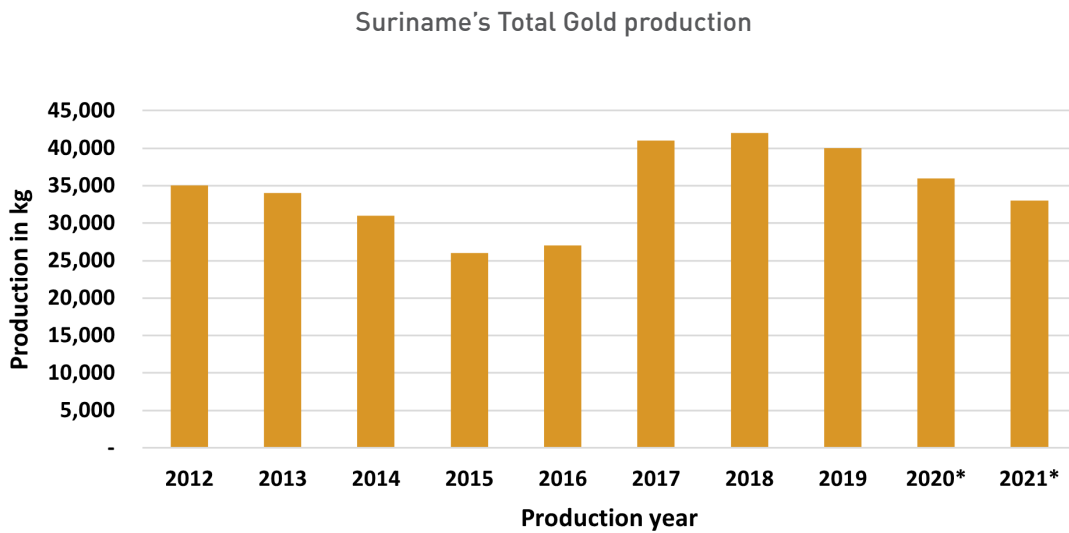
(Source: Government of Suriname, 2019 and 2020 and *Central Bank of Suriname).^{43 44}

Table 1 provides an overview of the gold produced in Suriname by both the large-scale and the small-scale gold mining sector. It is very challenging to determine the percentage of gold produced from illegal small-scale mining activities, but it is still crucial to include it in total estimated gold production statistics, although this may mean that actual gold production is much higher than the table shows. While illegal small-scale mining activity predominated in Suriname until 2016 (Table 1 and Figure 4), starting in 2017, the vast majority of Suriname's gold mined and the growth in gold exports have been the result of large-scale mining efforts, according to Surinamese mining estimates (Table 1 and Figure 4).

⁴³ Beleid, beleidsprioriteiten en programma's van de Regering voor het Begrotingsjaar 2019, Regering van Suriname, 2019, accessed at: <http://www.planningofficesuriname.com/jaarplan-ontwikkelingsplan/jaarplan-2019/>

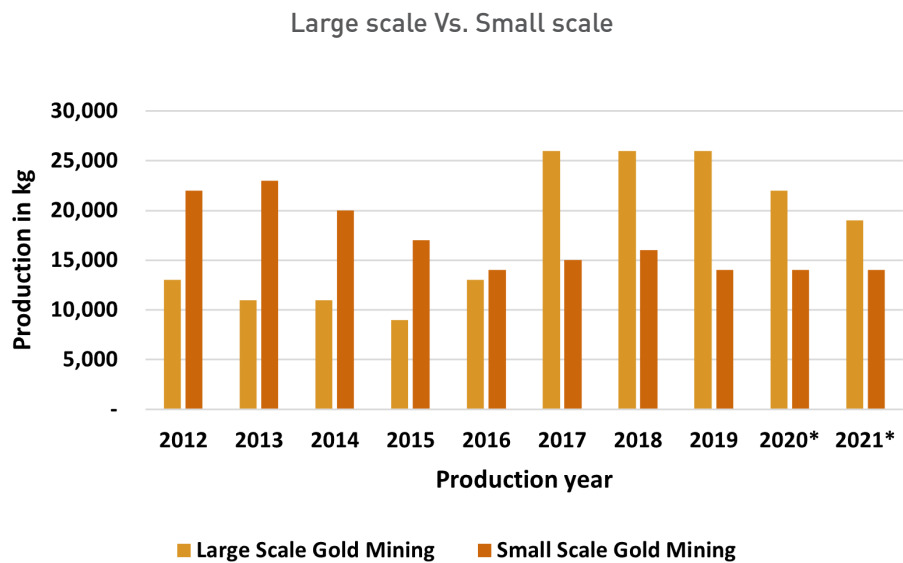
⁴⁴ Ontwikkelingsbeleid, -prioriteiten en -projecten van de Regering voor het Begrotingsjaar 2020, Regering van Suriname, 2020, accessed at: <https://www.planningofficesuriname.com/jaarplan-ontwikkelingsplan/jaarplan-2020/>

Figure 3: Surinamese Gold Production Statistics from 2012 to 2021* in kg



(Source: Government of Suriname, 2019 and 2020 and *Central Bank of Suriname).

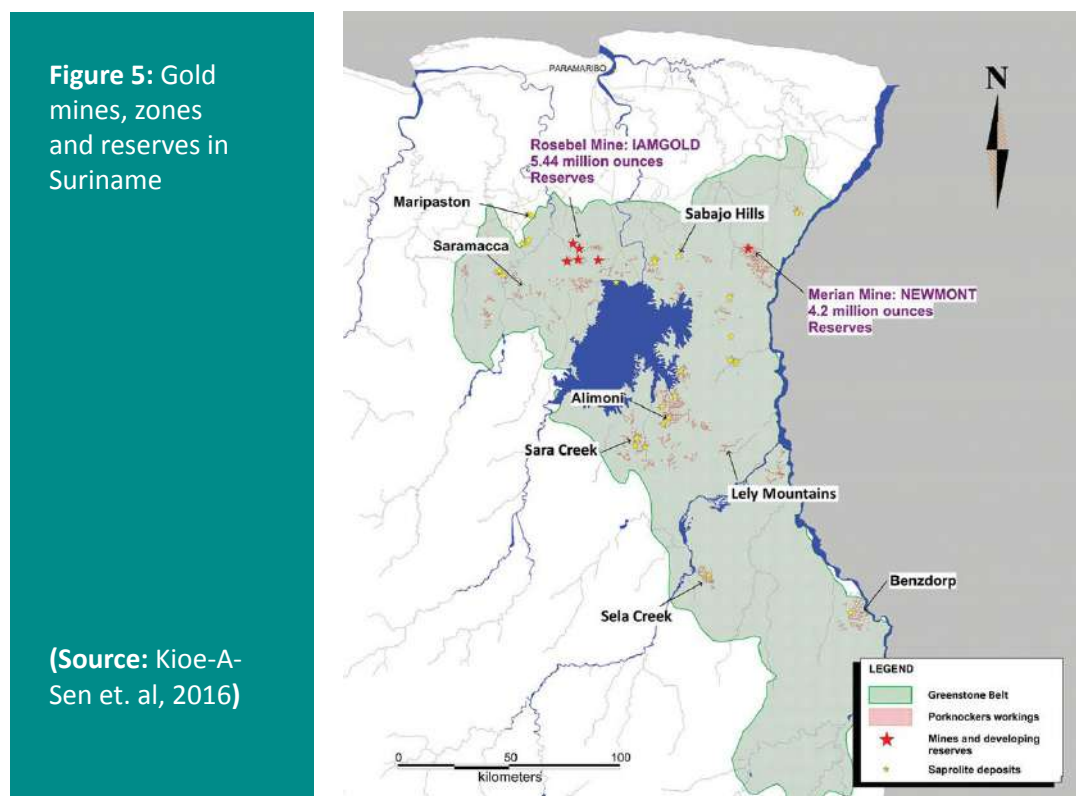
Figure 4: Large-scale gold mining vs. Small-scale gold mining production statistics in Suriname in kg



(Source: Government of Suriname, 2019 & 2020 and *Central Bank of Suriname).

From 2012 to 2015, small scale-miners encountered various problems, such as the drop in the international gold price.⁴⁵ In subsequent years, these problems negatively impacted their gold production. In 2016, in Suriname, Newmont Mining Corporation completed the construction of the Merian gold mine just in time to offset the decline in the gold produced by small-scale gold mining operations. Newmont started to add to gold production in the last quarter of 2016, and, in 2017, to gold exports, which resulted in the rising 2017 export figures (Figure 6).

While Suriname has gold reserves throughout the country, it has three main mining regions, namely: Rosebel in the Brokopondo District, Merian in northeastern Suriname, and Nassau within the Marowijne Greenstone Belt, near the border with French Guiana.⁴⁶ (Figure 5) Not by coincidence, these Suriname regions are also the areas where the multinationals now operate. Other regions, including Sara Creek (central Suriname), the Lely Mountains (central Suriname), Benzdorp (south-east Suriname), and Sela Creek have major gold deposits as well, but due to their remoteness, difficult access, and extensiveness, large-scale gold mining has not yet expanded to them.⁴⁷



⁴⁵ Beleid, beleidsprioriteiten en programma's van de Regering voor het Begrotingsjaar 2019, Regering van Suriname, 2019, accessed at: <http://www.planningofficesuriname.com/jaarplan-ontwikkelingsplan/jaarplan-2019/>

⁴⁶ Kioe-A-Sen, N. M., van Bergen, M. J., Wong, T. E., and Kroonenberg, S. B. (2016). Gold deposits of Suriname: geological context, production and economic significance. *Netherlands Journal of Geosciences*, 95(4), 429-445.

⁴⁷ Kioe-A-Sen, N. M., van Bergen, M. J., Wong, T. E., and Kroonenberg, S. B. Ibid.

DATA ON THE MINING LABOR FORCE

Most of the gold produced in Suriname on a small and industrial scale is mined within the boundaries of traditional Maroon communities. For the most part, these communities are situated in the central-eastern part of the country, which is also the area where the mineral-rich Greenstone Belt and gold deposits are located.⁴⁸

An estimated 20,000 to 35,000 persons work in Suriname's mining industry, primarily in gold extraction. However, for 2018, only 2,500 miners were officially registered and recognized by the government.⁴⁹ Estimates of non-registered gold miners range as high as 70,000, suggesting that the vast majority of miners are informal or otherwise unaccounted for in the mining sector.⁵⁰ The majority of Suriname's mines are operated by individuals or small firms, often informally or without licenses. Some miners have obtained a government small-scale mining permit (<200 ha), but have allowed others to work on their concessions even though these permits are not transferable (Figure 1). In addition, most of the workers in the mining industry are Brazilian migrants, referred to as *garimpeiros*.

Although Maroons have been mining gold in Suriname for over 100 years, modern small-scale mining techniques and artisanal machinery were introduced in the country by Brazilian gold miners. According to some estimates, roughly 60% of Suriname's mining labor force is composed of Brazilian illegal migrants.⁵¹ Their large influx to Suriname began in the 1980s, after Brazil began to regulate its mining sector, which led its miners to seek less regulated options in other countries, including Suriname. Indigenous and Maroons groups make up the rest of the mining labor force (about 33%), but recently Chinese migrants have begun to come to Suriname to work in its small-scale gold mining sector.

Because Brazilian miners are more organized and productive, native Suriname Maroons often work for them, offering them concessions to work on their land.⁵² In addition to miners, at least 20,000 others work in mining-related jobs, such as in hotels and bars, or as sex workers in communities near mines.⁵³

48 "Amazon Gold Rush: Gold Mining in Suriname," *Amazon Team*, 2015 – Gold mining in Maroon territory, accessed at: <https://www.amazonteam.org/maps/suriname-gold/>

49 Beleid, beleidsprioriteiten en programma's van de Regering voor het Begrotingsjaar 2019, Ibid.

50 Marieke Heemskerk and Rachael Van der Kooye, "Challenges to sustainable small-scale mine development in Suriname," *The Socioeconomic impacts of artisanal and small-scale mining in developing countries*, 2003, 661-678. Accessed at: https://www.researchgate.net/publication/237707335_Challenges_to_Sustainable_Small-Scale_Mine_Development_in_Suriname

51 ED Legg, PE Ouboter and MAP Wright. Small-Scale Gold Mining Related Mercury Contamination in the Guianas: A Review, 2015, accessed at: https://wwflac.awsassets.panda.org/downloads/mercury_contamination_in_the_guianas_2015.pdf

52 Marieke Heemskerk and Rachael Van der Kooye, Ibid.

53 Leontien Cremer, Judith Kolen, and Marjo de Theije, Ibid.



Mission OKGS regarding the evacuation of gold miners with all their mining equipment, Dam 10, Stuwmeer area / Source: OKGS.

FOREIGN TRADE IN AND THE EXPORTATION OF GOLD

In 2020, gold was the world's sixth most traded product, for a total trade value of \$422b. Gold accounts for 2.52% of total world trade.⁵⁴ From 2019 to 2020, gold exports rose by 23.8%, from \$341b to \$422b.

In 2014, Suriname's mining industry contributed 8% to the country's GDP. This had doubled by 2017, to 16%, probably as a result of Newmont Corporation's contribution.

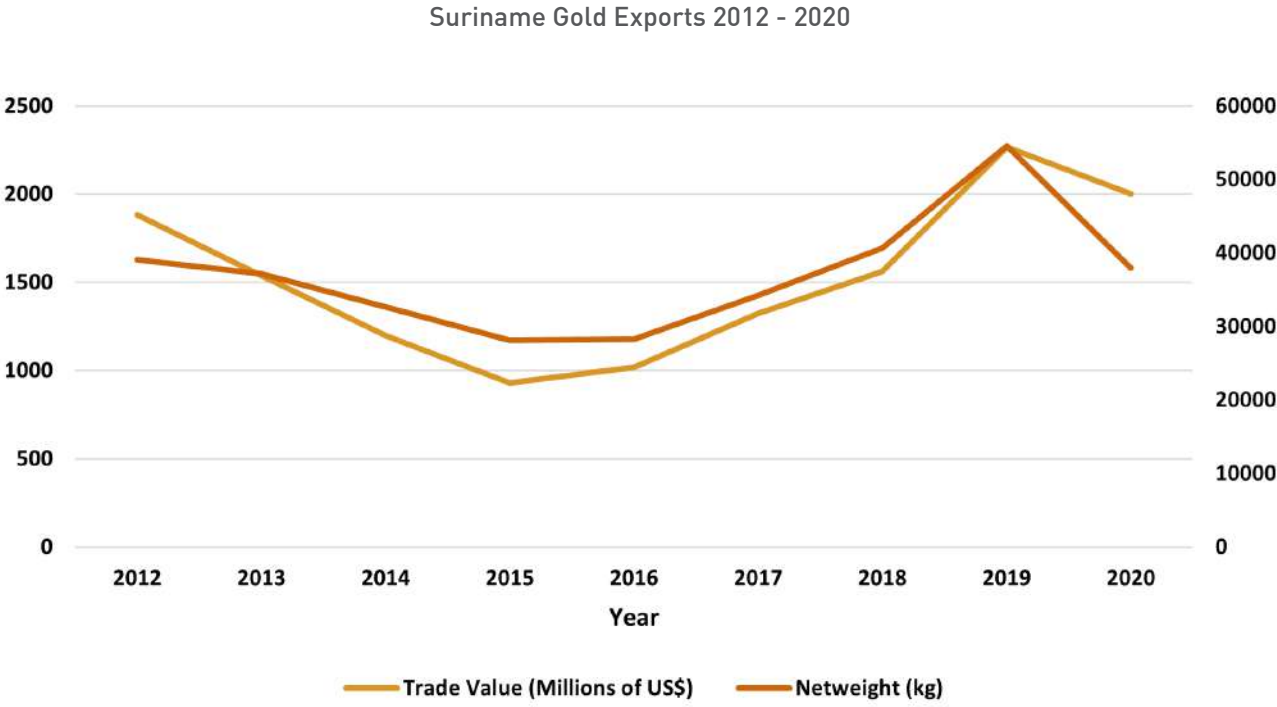
In 2014, the value of Suriname's gold exports was roughly US\$1 billion (\$1b). This figure had doubled by 2020, with Suriname earning a total of \$2b (\$2,003.21 million) from gold exports. This made it the world's 38th largest gold export earner (Figure 6). In 2020, gold was Suriname's most exported product, accounting for 67.3% of total exports.⁵⁵ Gold export values were significantly lower in 2015 (\$929m) and 2016 (\$1.02b), increasing dramatically in 2017 and 2018, and peaking in 2019 at \$2.26b. Estimates in Suriname suggest that small-scale mining production remained constant from 2012 to 2016, but large-scale mining efforts

54 <https://oec.world/en/profile/bilateral-product/gold/reporter/sur>

55 <https://www.discover-suriname.com/trade>

account for the increase in gold mining production and in exports after 2016. In 2012, Suriname’s gold export values peaked (\$1.88b) and did not exceed that amount through 2015 as a result of falling gold prices⁵⁶ and overall gold production. This explains the drop in export values in 2015 and 2016 (Figure 6).

Figure 6: Suriname Gold Exports from 2012 to 2020



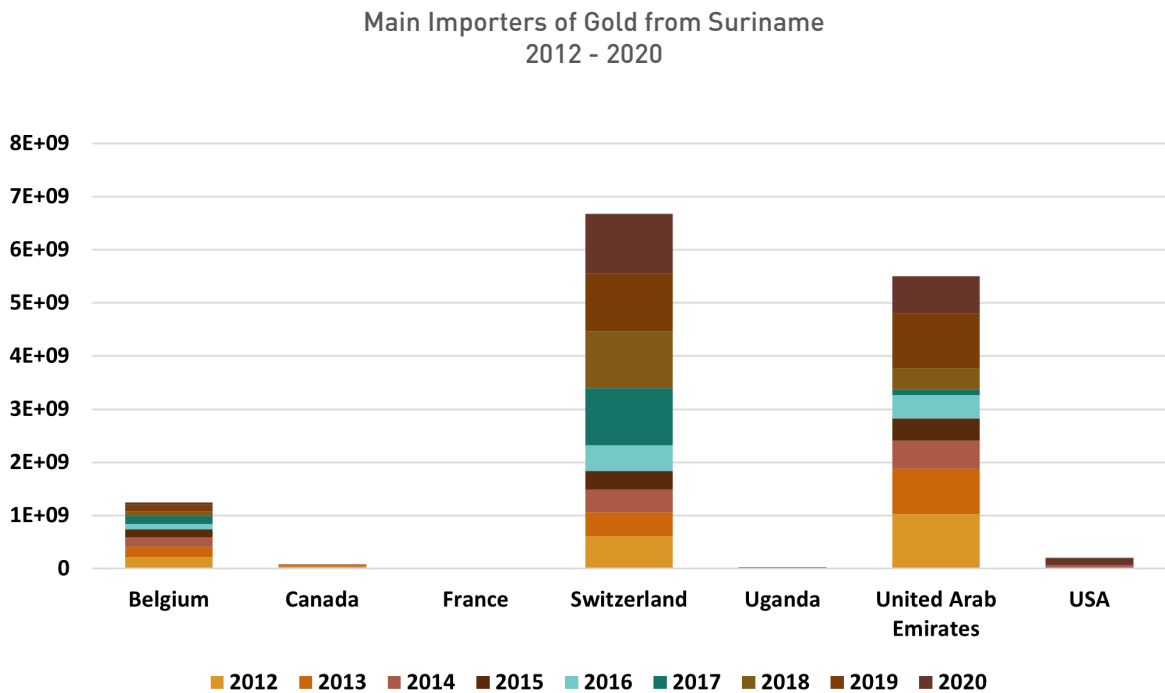
(Source: UN Comtrade).

56 <https://www.macrotrends.net/1333/historical-gold-prices-100-year-chart>

In 2020, the main destinations for Suriname’s gold exports were Switzerland (\$1.12b), United Arab Emirates (UAE) (\$704m), United States of America (USA) (\$130m), and Belgium (\$52m)⁵⁷ (Figure 7).

Each year from 2012 to 2020, Switzerland, United Arab Emirates and Belgium were Suriname’s main trading partners. Unites States of America did not import gold from Suriname or did not report any gold imports in 2012, 2016, 2017, and 2018 (Figure 7).

Figure 7: Overview of imports of gold from Suriname in the years 2012 till 2020



(Source: UN Comtrade).

Other less important trading partners are: Canada, France and Uganda. Figure 7 shows that Belgium has imported roughly constant amounts over the years, while exports to Canada have declined. Exports to the United States of America (USA) fell from 2014 to 2015, but began to rise again in 2020. Figure 7 shows that France and Uganda import much less gold and also not every year as compared to the other importing partners.

⁵⁷ <https://oec.world/en/profile/bilateral-product/gold/reporter/sur>

THE CONTRIBUTION OF THE LARGE-SCALE GOLD MINING COMPANIES IN SURINAME

Two large-scale gold mining (LSM) companies are actively operating in Suriname: Rosebel Gold Mines N.V (RGM), a subsidiary of the Toronto-based IAMGOLD Corporation, and Newmont Suriname LLC. RGM operates the Rosebel Gold Mine, located in the Brokopondo area. IAMGOLD owns 95% of the mine and the Republic of Suriname has 5% ownership. Commercial gold production from the Rosebel Gold Mine began in 2004 and continues today.⁵⁸ IAMGOLD plans to expand gold production from its Rosebel operations in Suriname under a partnership with Suriname's state-owned oil company (Staatsolie Maatschappij Suriname N.V.). The latter company has a 30% interest in the concessions, including the Saramacca gold project, under an unincorporated joint venture (UJV) agreement signed by the two parties. The above-mentioned Rosebel Gold Mine is excluded from this agreement.⁵⁹ ⁶⁰

Newmont Suriname LLC, formerly known as Surgold (Suriname Gold Company LLC), operates the Merian gold mine ("Merian") on behalf of Suriname Gold Project CV (a Suriname limited partnership) and is its managing partner, with a 75% interest in that partnership. The remaining 25% interest is owned by the state oil company (Staatsolie) on behalf of the Government of Suriname. Merian's construction began in August 2014, and it first produced gold on a commercial basis in October 2016.⁶¹ Newmont's increased contribution to Suriname's total gold production and exports became evident in the years that followed.

Suriname's two LSM companies are members of the World Gold Council (WGC). As WGC members, their value-added gold export contribution to national GDP is 16.3%.⁶² Until 2019, estimates put Suriname's total labor force at 204,200. In 2020, the number of people working directly and indirectly for the two LSM companies was about 26,560, i.e., 13% of the total labor force. In that year, 2,923 people (1.43% of the total labor force) were working directly in the LSM sector.

GOLD PRODUCTION VS. GOLD EXPORTATION

Figure 8 shows that in some years, Suriname's export volumes exceeded its production volumes. One likely explanation is that gold is smuggled into Suriname. Researchers estimate that from 30% to 60% of the gold exported from Suriname is smuggled into it from Guyana. This is due, in part, because Guyana's strict tax and royalty structures make it more favorable for Guyanese miners to sell their gold in Suriname. Customs

⁵⁸ <https://www.iamgold.com/English/operations/rosebel/default.aspx>

⁵⁹ <https://www.bnamericas.com/en/news/iamgold-staatsolie-plan-suriname-gold-boost>

⁶⁰ <https://www.staatsolie.com/nl/nieuws/staatsolie-en-iamgold-rosebel-gold-mines-n-v-tekenen-overeenkomst/>

⁶¹ <https://www.newmont.com/investors/news-release/news-details/2018/Newmont-Suriname-reaches-one-million-ounce-production-milestone/default.aspx>

⁶² [The social and economic contribution of gold mining | World Gold Council](#)

data show that gold from Guyana is also being exported lawfully through Suriname (“transit”). Not only is gold illicitly trafficked into Suriname from Guyana, but likely from French Guiana and Brazil as well, and is then exported as Suriname-sourced gold.

Figure 8 shows that in some years, the opposite is the case: production volumes exceed export volumes. One reason for this is that some of the gold produced is traded and processed on the local market (e.g. jewelers) or is being kept in reserve while awaiting more favorable market conditions.

Another explanation for the discrepancy between production and export data are the non-uniform and non-strict data gathering and analysis protocols. In Suriname, different sources gather and analyze data. Data collection and analysis for this report was a very challenging task owing to differences in data quality and processing. It is recommended that investments be made in capacity-building and the institutional strengthening of Suriname’s data portals for the gold mining sector, and that work be done for stricter data- and information-sharing among relevant stakeholders.

Figure 8: Gold Production (Source: Government of Suriname, 2019 & 2020 and *Central Bank of Suriname) vs. Gold Exportation



(Source: UN Comtrade).



Fieldwork carried out by trainees under the supervision of GMD, Bèwojo area/ Source: GMD.

MERCURY IMPORTATION IN THE GOLD SECTOR

As for the mercury used in Suriname's mining sector, no mercury imports have been reported since 2003, as a result of a regulation enacted that year, this although mercury is one of the chemicals most used in gold mining. The evident conclusion is that the mercury used in mining in Suriname enters the country illegally.

SURINAME'S CHALLENGES IN CONNECTION WITH ILLICIT GOLD MINING PRACTICES

Illicit practices in gold production and exportation are present throughout the gold supply chain and pose both institutional and sector challenges in combating different forms of illicit mining. Specifically, Suriname's mining sector faces several primary institutional challenges. Suriname has taken some important steps by incorporating a national risk assessment and strategies for mitigating those threats in its National Risk Assessment (NRA) 2019-2020. But no sector-specific risk assessment has yet been made. This means that no clear law enforcement or government-defined typologies exist for illicit gold movements or money laundering of the proceeds of these illicit activities. In view of recent observations by field investigators, it may reasonably be assumed that many of the typologies described elsewhere are relevant in Suriname. This includes exporting gold as scrap jewelry in order to get it to market; the use of money transfer agencies to move money abroad, with the added complication that Surinamese currency is not readily convertible on the world stage so that this is a significantly limited option; the use of fictitious gold sale agreements as justification for large cash deposits; and the uses of cash couriers to move cash out of the country.

It is also important to implement mechanisms to control the movement of mercury into the country from any point of origin, and from point of import to mining sites, as well as mechanisms for reconciling the amount of mercury needed in lawful industry with the actual amount of mercury acquired in order to be able to identify points of diversion.

However, with neither available data nor the ability to conduct research in-country, there is no way to assess the prevalence of these typologies, and the need to discard those that may not be relevant and to add newer ones that are more relevant.

One of Suriname's most important evident institutional challenges is the outdated 1986 legislation still governing the country's mining practices. This section highlights a few of the illicit mining methodologies specific to Suriname, as well as more general illicit mining red flags. In general, the risk of illicit mining practices is greater in any mining activity manifesting one or more of these red flags. That said, such mining activities are not necessarily illicit.

RED FLAGS



MINING ALONG BORDERS: Illicit activity in connection with mining operations along international borders is of particular concern since precursor materials, machinery, gold, and even miners' movements are more difficult to monitor there. This is an apparent concern along each of Suriname's borders, namely, with French Guiana, Guyana, and Brazil.⁶³ Suriname has significantly different tax laws on gold processing. Until December 31, 2021, Suriname imposed a 2.75% royalty and 1.25% tax, and no paperwork to declare gold was required, whereas Guyana charges 5% royalties and 2% taxes. For that reason, gold miners will bring their gold to Suriname from both Guyana and French Guiana to be declared and sold.⁶⁴ On January 1, 2022, royalties in Suriname were adjusted to 4.5%. The effect of this change on gold smuggling into Suriname will be determined in due course.



MERCURY USE: Suriname has not declared any mercury imports since 2003, yet mining with the use of mercury continues. Research suggests that mercury enters Suriname from Guyana, probably across or near the Corriverton border or in container ships arriving in Suriname's maritime ports.⁶⁵ Or the reverse, mercury may first enter Suriname illicitly and then move into Guyana⁶⁶ and French Guiana as well.⁶⁷ Evidently, mercury is sold in Paramaribo and then taken out to mines throughout Suriname. For Suriname, mercury

⁶³ Barbara Hendus, et al., Ibid.

⁶⁴ Dezécache, C., Faure, E., Gond, V., Salles, J. M., Vieilledent, G., and Héroult, B. (2017). Gold-rush in a forested El Dorado: deforestation leakages and the need for regional cooperation. *Environmental Research Letters*, 12(3).

⁶⁵ Barbara Hendus, et al., Ibid.

⁶⁶ Interviews by Guyana-based researcher with miners and a law enforcement official between February and June of 2020..

⁶⁷ Political Ecology of Mercury – Suriname SRJS a strategic partnership between IUCN NL, WWF NL and the Netherlands Ministry of Foreign Affairs, 2019

use itself is a red flag for illicit activity, since Suriname has banned all mercury imports and authorities are unable to control mercury trafficking. While Suriname is a signatory to the 2018 Minamata Convention on Mercury, it is not yet enforced and is still at the implementation stage. The aim is to achieve a 30% reduction in mercury use by 2030.



EXPORTING TO A HIGH-RISK COUNTRY: Most Surinamese gold is exported to the UAE, which is logical given the UAE’s refining capacities. That said, the significant increase in Surinamese gold exports to the UAE since 2015 (which would also be a concern if exports had increased so dramatically to any other country) is a potential red flag for illicit activity. Moreover, researchers estimate that from 30% to 60% of Suriname’s gold exportation figure actually includes gold smuggled into Suriname.⁶⁸ Therefore, since much of the gold exported from Suriname may have originated in nearby countries (including Guyana, French Guiana, and Brazil), Suriname then becomes a high-risk export country and the UAE potentially a high-risk import country.



INFORMAL OR SMALL-SCALE MINES: This is widespread in Suriname and has not yet been quantified. Fieldwork found that most mining in progress was informal and small-scale, with miners paying a percentage of the gold mined to the landowner or claim holder. Most mines had five to 10 people working at the same time, usually with an armed foreman in charge to guard against theft by miners and raids by workers from other mines. The small amounts of gold mined in these pit mines dug with backhoes are then sold outside formal government marketing systems.



LOCAL BUYERS: In addition to the Kaloti Suriname Mint House (KSMH) refining and exporting processes, Paramaribo also has local “gold shops.” Local buyers can purchase and declare gold without having to meet stringent requirements on its sourcing.⁶⁹ This process not only makes it hard to ascertain the origin of gold, but further obscures the regulation of gold production and exportation processes. This is of particular concerns since Guyana, for instance, estimates that 50% to 60% of its gold is trafficked into Suriname before being declared.⁷⁰

68 Barbara Hendus, et al., Ibid.

69 “Golden Detour: The hidden face of the gold trade between the United Arab Emirates and Switzerland,” Ibid.

70 “Close to 60% of Guyana’s gold smuggled overseas”, Inews Guyana, January 7, 2016, accessed at: <https://www.inewsguyana.com/close-to-60-of-guyanas-gold-smuggled-overseas-trotman/>



SECONDARY ILLICIT ACTIVITIES: Violence and secondary illicit activities are also associated with mining in Suriname. For instance, some Brazilian criminal groups reportedly have profited from its mining activities.⁷¹ Robberies and turf wars between illicit mining groups have also been reported in the country.⁷² Cases have been documented of child labor, sexual slavery and commercial sex work, human trafficking, and other crimes that often accompany illicit mining.



MONEY LAUNDERING OR TERRORISM FINANCING (ML/TF): There is an ever-present risk of abuse by traders in gold, other precious metals, and gemstones because precious metals and gemstones have a high real value and can be found in relatively small sizes, facilitating their transport, purchase, and sale.

Under the Risk Based Approach (RBA), dealers in gold other precious metals, and gemstones must identify the areas within the sector that are vulnerable to use by criminals for activities potentially related to ML/TF. This means that traders in gold, other precious metals, and gemstones must assess the risks associated with all business relationships and activities and develop an industry-specific risk assessment.

Specifically, the following risk factors needs to be addressed:

- I. Client risk.
- II. Services risk.
- III. Geographic risk.

Traders in gold, other precious metals, and gemstones should take into account the types of client, the services provided, and the place where services/transactions are performed. If situations are identified that represent a high risk for ML/TF activities, these risks should be managed by implementing mitigation measures, including ongoing monitoring and keeping client information current. However, traders in gold, other precious metals, and gemstones may sporadically conduct business with clients, e.g. single transactions. In such cases, the client will not provide much information, as opposed to a client who is a regular part of a business relationship. Risk assessments of clients doing occasional business with traders

⁷¹ Douwe den Held, "Corruption, cocaine, and gold – the trials facing Suriname's new president," *InSight Crime*, July 16, 2020, accessed at: <https://www.insightcrime.org/news/analysis/trials-suriname-new-president/>

⁷² Douwe den Held, *Ibid.*



Mined out area where no rehabilitation has taken place, surrounding the nature reserve Brownsberg / Source: MNR-Communications.

in gold, other precious metals, and gemstones will focus on tracking/monitoring these transactions. These checks are mandatory so that unusual transactions are reported if it is suspected that they are related to ML/TF.

I. RED FLAGS RELATED TO CLIENTS:

- A client who doesn't seem to be concerned about price.
- A client who uses cash to buy gold, other precious metals, and gemstones, especially in large quantities.
- A client attempting to use a third party check or credit card from a third party.
- A customer who indiscriminately purchases goods without regard for value, size or color.



Mined out area where no rehabilitation has taken place, surrounding the nature reserve Brownsberg / Source: MNR-Communications.

- A purchase that appears to be beyond the client's capabilities based on their stated profession.
- A customer who is reluctant to provide adequate identification information when making a purchase, or who wishes to maintain a high degree of secrecy regarding the transaction, such as requesting that no normal business records be kept.
- A client who negotiates a purchase at market value or above the asking price.
- A client who the media has reported to be involved in criminal organizations.
- A client with unusual concerns about AML/CFT policies and procedures.
- The address provided by the client is unknown, considered incorrect, or is simply a correspondence address.

Traders in gold, other precious metals, and gemstones need to assess the risks in addition to client risks, including services risks, to determine if they pose a high risk of ML/TF. Below are some examples of factors related to services that may be considered high risk.

II. RED FLAGS RELATED TO SERVICES PROVIDED:

- An established client who buys much larger than usual amounts of gold, other precious metals, and/or gemstones for no apparent reason.
- Misrepresentation of the purity, weight, origin, and/or value of gold, other precious metals, and/or gemstones on customs declaration forms.
- Precious metal with physical characteristics inconsistent with industry standards.
- Gold prices higher than on the local gold market.
- Purchases or sales unusual for the client, illogical from a business or economic standpoint, or not conforming to standard industry practices.

III. RED FLAGS RELATED TO GEOGRAPHIC RISK:

Lastly, in assessing geographic risks, traders in gold, other precious metals, and gemstones must take into account business relationships conducted in or from Suriname. A geographic risk red flag is a business relationship with a client from a jurisdiction of high ML/TF risk or a country where no or inadequate AML/CFT legislation is in place.

The activities listed above represent potential red flags, although mining activity that manifests one or more such criteria is not necessarily illicit. That said, in instances where more than one of these criteria occur together, the probability is higher that illicit activity is taking place. With each additional criterion, the probability of illicit mining increases.

The issues addressed here are not easily resolved. Nonetheless, they will need to be handled at both a local and a regional enforcement level (meaning all of the Guianas region). Customs officer, law enforcement agency, and justice department participation and collaboration will be crucial in addressing illicit mining and updating Suriname's legal framework. Additionally, better data collection and maintenance may be of assistance in identifying instances of illicit mining.

CONCLUSIONS

Suriname has a long history of mining on a little developed and small-scale basis owing to its relative geographic isolation, language barriers, and ethnic tensions. Administrations over the years appear not to have taken effective steps to gather and disseminate data or to tackle the multi-layered structures that comprise the chain supplying illicit gold and its lucrative benefits. The current administration, while claiming that bringing order to the chaos of the current system is a high priority, may find real reform a major challenge.

Suriname has an outdated legal framework that does not address the challenges of today's globalized gold market, and existing regulations are not enforced effectively owing to capacity- and financing-related challenges. Although the previous administration made some attempts to better address illicit mining through the establishment of an interagency gold commission, it has not had dramatic impact. The current administration continues efforts in this important area and has begun by working on and putting in place legal instruments to address the various issues.

Suriname's legal framework may be old and need to be updated, but because of the country's long borders with other countries and inadequate logistics, law enforcement authorities are unable to enforce the legislation fully. Enforcement's only chance of success is if it is effected in the context of coordinated regional policy across the Guianas. This is likely the only rational policy for limiting environmental harm and addressing some of the cross border challenges that the Guianas face in connection with illicit gold mining.⁷³

In its Multi-years National Development Plan 2022-2026, the current government has identified the next steps as its main policy actions:

- Initiation of a Public-Private Partnership (PPP) with a company to lease drones for the surveillance of criminal and illegal activities. Based on Terms of Reference (ToR) a public tender will be conducted for the short-term leasing of surveillance drones as part of a long-term program.⁷⁴

73 Dezécache, C., et al., Ibid.

74 Multi-years National Development Plan 2022-2026 of the Republic of Suriname (20 December 2021) – Thinking, Connecting, Doing - (page 47 A.6.5 Surveillance tegengaan Illegaliteit en Criminaliteit).

- Establishment of an environmental authority with responsibility for technical implementation of the environmental policy, with all tools needed for corrective action and for providing incentives.⁷⁵
- Enactment of a new mining law that sets clear rules for rehabilitation, the informal gold sector, and issuance policy.⁷⁶
- Implementation of gold mining that does not use toxic substances, with an emphasis on eliminating the use of mercury in gold extraction.⁷⁷
- Establishment of a rehabilitation plan for areas now affected. This plan can be implemented with internationally available funds.⁷⁸

75 Multi-years National Development Plan 2022-2026 of the Republic of Suriname (20 December 2021) – Thinking, Connecting, Doing - (page 55 A.6.7 Natuur en Milieu).

76 Multi-years National Development Plan 2022-2026 of the Republic of Suriname (20 December 2021) – Thinking, Connecting, Doing - (page 87 A6.14 Goud).

77 Multi-years National Development Plan 2022-2026 of the Republic of Suriname (20 December 2021) – Thinking, Connecting, Doing – page 87 A6.14 Goud).

78 Multi-years National Development Plan 2022-2026 of the Republic of Suriname (20 December 2021) – Thinking, Connecting, Doing – page 87 A6.14 Goud).



GMD talking to illegal miners during regular field check/ Source: GMD.

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