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Fool's Gold

The Case for Scrutinizing Sudan's Conflict Gold Trade

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Executive Summary

Gold coming from Sudan is conflict-affected, high-risk, and helping to destabilize Darfur, Blue Nile, and South Kordofan, the country's main conflict zones. In those areas, civilians living around gold mining sites have suffered killings, mass rape, and the torching of their homes and fields at the hands of armed groups, including the Sudanese army and tribal militias fighting with government backing. In North Darfur[1] and Blue Nile,[2] mining areas have been both the sites and the objects of conflict. In South Kordofan, mining benefits the Sudan Peoples' Liberation Movement-North (SPLM-N).

Because the gold mined in Darfur's conflict-affected Jebel Amer region benefits Musa Hilal,[3] a Janjaweed leader on both the U.N.[4] and the U.S.[5] sanctions lists, both the U.S. government and the U.N. Security Council should use their existing sanctions authority on Darfur to investigate the role of the gold trade in driving the violence in that region. Based on these investigations, both the United States and the United Nations should make additional sanctions designations against gold traders and companies facilitating the destabilizing trade in Darfur's gold.

Beyond Darfur, mines in both Blue Nile and South Kordofan are also conflict-affected. Since the vast majority of Sudan's gold is purchased, consolidated, and exported by the government, it is almost impossible to distinguish which gold comes from conflict-affected areas and which gold comes from other sources. In light of this ambiguity, the United States should urge international gold industry leaders to red-flag all gold shipments from Sudan as "conflict gold" under existing auditing programs and to demand that those buying Sudanese gold trace it to its mine of origin.[6] Unless gold from Sudan can be verifiably traced to a conflict-free mine of origin, it should be flagged as high risk during audits and excluded from responsible buyers' supply chains.

These combined due diligence efforts should help to reduce the market price for conflict-affected gold from Sudan. When combined with targeted sanctions on gold traders, these measures should make it harder for the government of Sudan, its Janjaweed proxies, and other armed groups to profit from war and use gold to fund their operations.

Below we outline the scope of the problem and offer policy recommendations.

Where are Sudan's gold mines?

Sudan boasts 944 tonnes (1,057 tons) of gold reserves.[7] Gold mines are scattered across Sudan, including Darfur, South Kordofan, and Blue Nile. These are the principal zones of conflict in Sudan today. Artisanal gold mining is also drawing hundreds of thousands of artisanal miners to the deserts of Sudan's northern and eastern states, areas that have not seen large-scale conflict yet.[8]

Historically, Sudan exported most of its gold from mines in the relatively peaceful northeastern part of the country. Until 2012, 74 percent of the country's proven gold reserves were being managed through just two companies:[9] the Canadian-Egyptian-Sudanese joint venture Ariab[10] and the Moroccan-Sudanese venture Managem.[11] Those companies' concessions are in Red Sea and Nile states respectively, far from the country's war zones. Although these large-scale mines attracted criticism for their poor labor conditions and negative environmental impact, the country's gold trade was never directly touched by its wars.[12] This changed dramatically in 2012 with the discovery of significant gold deposits in North Darfur. The discovery of gold in Jebel Amer attracted a flood of at least 100,000 artisanal miners to the area.[13] Since then, artisanal gold has eclipsed industrial gold production. Although the government has granted more than 120 companies mining concessions, these sites have yet to yield much exportable gold.[14] Last year, only 10 of the 73.3 tonnes (11.2 of 82.1 tons) of gold produced in the country came from industrial mining operations.[15] The remaining gold was unearthed by one million artisan miners, many in the country's conflict zones.[16]

Who controls Sudan's conflict gold mines in North Darfur, South Kordofan, and Blue Nile?

In North Darfur, competition over mining areas reflects the broader political landscape.
In January 2013, the gold mining area of Jebel Amer in North Darfur was the site of mass ethnic cleansing and violent displacement.[17] The site is now under the control of the Awakening Revolutionary Council and Musa Hilal, a tribal leader and infamous Janjaweed commander.[18] Hilal is one of four people that the U.N. Security Council has already placed under sanctions for his previous role in the abuses leading up the genocide in Darfur.[19] He now claims control over one of the most productive mining sites in the entire country.

With tacit government backing, Hilal's forces overran Jebel Amer, a Beni Hussein stronghold, in early 2013.[20] As Magdi El Gizouli, a fellow at the Rift Valley Institute explains, "The government is so desperate for the gold that they are willing to stoke conflict to get artisanal mines under its control."[21] Mass displacement and serious human rights abuses ensued. In a classic divide-and-conquer move, the government imposed a July 2013 treaty between the Abbala and Beni Hussein

tribes, which gave control of the Jebel Amer mining area to the government.[22] At the same time, Hilal mediated his own parallel peace treaty[23] that allows him to continue to exercise his influence over the area through a parallel system of taxation. At the time, the North Darfur state Minister of Finance Abu Daoud Suleiman announced that the government would levy a fee on all gold mined from the area.[24] By substantially reducing the Beni Hussein community's stake in the enterprise, this agreement reallocated proceeds from the mine in favor of the government and its Abbala allies. A year later, in August 2014, the central government sought to grant industrial mining concessions over the area to two companies with ties to the Islamic Movement in Sudan: MAM for Mining and Minas.[25]

While Hilal continues to assert *de facto* control over the mine through the Awakening Revolutionary Council, the government has awarded *de jure* rights to these companies, which hope to ring-fence the operations. As of December 2014, Hilal's Awakening Revolutionary Council had set up its own management board to govern mining in Jebel Amer and impose its own taxes.[26] Despite Hilal's benefit from gold at its point of origin, the trade puts profits into the hands of the government because it is sold to the Central Bank.

Additionally, local media reports that Janjaweed war criminal and leader of the Rapid Support Forces Mohammad Hamdan Dagolo independently owns at least three mines in Jebel Amer.[27] Following detailed reporting by the U.N. Panel of Experts on Sudan,[28] Dagolo's Rapid Support forces were recently singled out by the U.N. Security Council for violations of Security Council Resolution 1591.[29]

Although they only produce limited quantities of gold, mines in Blue Nile and South Kordofan states have also been sites of conflict, according to the research organization International Peace Information Service (IPIS). In 2012, the Sudan Armed Forces took over two mines in Blue Nile state, one in Belguwa, 60 kilometers north of al Damazin and the other south of Geissan.[30] Red Rock Mining Company now holds the concession near al Damazin.[31] Red Rock is a subsidiary of Sudan Master Technology, a government-owned company on the U.S. sanctions list. Eyat Mining and Exploration operates the site near Geissan.[32] In the same period, the rebel SPLM-N took over two mines near Rashad town in Blue Nile—Zalataya and Jebel Mahala.[33]

The SPLM-N also controls mines in South Kordofan state, including six sites in Heiban country.[34] IPIS has found evidence that proceeds from SPLM-N mining are deposited in the Mountain Trade and Development Bank in Juba.[35]

Where does the gold go after leaving the mines?

In Sudan, the Central Bank enjoys a *de jure* monopoly of gold processing and sale abroad. It operates the country's only refinery[36] and is the only entity allowed to sell gold abroad.[37] Because gold exports are currently one of the government's primary sources of foreign exchange, the Central Bank is willing to offer competitive domestic prices to discourage small-scale miners from clandestinely selling their gold to smugglers.[38]

The Central Bank of Sudan prints money to buy local gold at high black-market currency rates and then sells it for dollars on the global market at the much lower official exchange rates.[39] But this approach is unsustainable in the long run. Three years of gold purchases by the Central Bank of Sudan have led to massive injections of liquidity in the market and faster reserve money growth than expected, which in turn has caused further inflation. The International Monetary Fund (IMF) is now recommending that Sudan "reduce unsterilized gold purchases, and refrain from using the parallel exchange rate for these purchases."[40] By noting the government's problematic use of the parallel exchange rate to finance its "unsterilized" gold purchase, the IMF report makes clear that the current approach, which relies on the difference between the black-market currency rate and the official global exchange rate, is fiscally unadvisable.

How does Sudanese gold reach the global market?

With the exception of limited sales to Canada, Saudi Arabia, and South Africa, Sudan sells most of its gold to the United Arab Emirates.[41] Once Sudan's gold reaches the Emirates, it enters the international market and ends up in consumer electronics, jewelry, aviation parts, and banks. Last year, the Sudanese government only officially exported 37 of the 73.3 tonnes (41.4 of 82.1 tons) of the gold it claims was produced within the country.[42] More research is needed on what happens to the other 36.3 tonnes (40 tons).

It is worth noting that the government of Sudan is not earning full market value for its exports. The IMF found that Sudanese gold exports earn less per ounce compared to the international rate. In 2013, Sudanese gold sold for $1.198 per ounce while gold on the international market commanded $1.411 per ounce at the time.[43] In 2012, the gap was even more pronounced—at $0.343 per ounce.[44] Despite these unfavorable terms, the Sudanese government continues to buy gold from miners at the international rate since gold exports remain one of its only sources of foreign exchange.

Why is gold so important to the Sudanese economy?

With the loss of oil revenues, gold is becoming the government's lifeline for foreign exchange, which the Sudanese government desperately needs and has lost in its effort to defend the national currency from double-digit inflation. Sudan's President Omar al-Bashir himself has acknowledged that although "we lost oil, we got gold."[45] Sudan is the 12th largest gold producer in the world and the third largest in Africa, so these exports are not insignificant.[46] The IMF projected that "an anticipated good agriculture harvest and continued robust gold production are expected to strengthen economic growth [in Sudan] to about 3½ percent."[47]

According to the IMF, in 2011, gold exports accounted for only 13 percent of the country's total exports.[48] By 2012, that number climbed to 42 percent.[49] Despite a drop in exports in 2013, gold sales still made up 36 percent of overall exports.[50] Fitting that pattern, the IMF projects that 2014 gold sales earned the government at least $1.172 billion.[51] The Sudanese government itself boasts that sales earned $1.36 billion last year.[52] Especially in light of debilitating sanctions on Sudan's Central Bank, gold acts as a vehicle to secure reliable streams of foreign exchange. Iran employed a similar strategy with its "gas for gold scheme" involving Turkey.[53] In that arrangement, Iran sold

its gas to Turkey in exchange for gold. It then sold that gold to the United Arab Emirates in exchange for foreign currency. At the height of the U.S.-led sanctions campaign, Iran relied on this scheme to buttress its economy and secure a reliable stream of foreign currency through sales of gold to the United Arab Emirates. Sudan has adopted a similar approach.

How do we know which gold shipments exported from Sudan come from conflict–affected areas?

It is impossible to tell. Because all of Sudan's gold mixes together at the Central Bank before export, there is no way to distinguish between gold mined from conflict-affected areas in North Darfur, South Kordofan, and Blue Nile and gold from mines that meet responsible sourcing criteria.

The London Bullion Market Association (LBMA),[54] the Responsible Jewellery Council (RJC),[55] the Conflict-Free Sourcing Initiative (CFSI),[56] and the Dubai Multi Commodities Center (DMCC)[57] have all asked or required their members to conduct due diligence on their supply chains for connections to conflict and use conflict-free auditing systems. The new conflict-free audits have flagging systems for gold from conflict or high-risk countries, including places where the gold has been associated with serious abuses or support to armed groups.[58] These efforts align with the Organization for Economic Cooperation and Development (OECD) position in its supplement on gold to its due diligence guidance for responsible supply chains of minerals from conflict-affected and high-risk areas.[59] To date, these auditing systems have mainly been used to screen for gold from the Democratic Republic of the Congo because of the conflict minerals provision in the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act.[60] The lack of widespread knowledge about Sudan's conflict gold dynamics has allowed high-risk gold from Sudan to continue to make its way into the international market.

What can we do to limit profits from Sudan's conflict gold trade?

There are a number of steps that could help stop Sudan's conflict gold trade:

1. **Task U.N. experts with investigation of Darfur's gold trade:** In its engagement with its Panel of Experts, the Sudan Sanctions Committee should task the Panel with investigating connections between gold and all the armed groups operating in Darfur, including the government's security services. Because he is already on their list, Musa Hilal should receive special attention from the Panel for his connections to the gold trade.

   There is precedent for this type of approach. U.N. Security Council Resolution 2198 found that the "illicit trade of natural resources, including gold or wildlife" constitutes an act that undermines "the peace, stability or security of the DRC."[61] Resolution 1591, which set up the U.N.'s sanctions regime on Darfur, also allows for punitive measures against anyone found to be "a threat to stability in Darfur and the region."[62] However, this language has not been interpreted to include natural resource trade in the case of Darfur. Because the gold trade has become a major source of financing for armed groups and a

threat to the region's stability, an analogous interpretation of the scope of Darfur sanctions is appropriate.

2. **Prioritize building dossiers on key gold traders within Sudan and warn international traders of possible sanctions:** Like the United Nations, the U.S. government has its own sanctions authority, allowing designations of those found to be contributing to destabilizing Darfur.[63] The U.S. Department of the Treasury should build dossiers on the traders who carry gold from mines in Darfur and those who sell gold to the Central Bank. Under Executive Order 13400, anyone who constitutes a threat to the stability of Darfur and the region can be designated for sanctions. U.S. diplomats should make it clear to interlocutors in the Emirates, Saudi Arabia, and South Africa that unless traders in their countries stop purchasing from conflict-affected supply chains originating in Darfur, any traders who import from Sudan may also be investigated for U.S. sanctions designation under the premise that the gold trade destabilizes the region.

3. **Take legislative action to curb trade in conflict-affected gold from Sudan:** Given the gravity of the threat that the gold trade presents, the U.S. Congress should expand the scope of Sudan's sanctions outlined in the 2006 Darfur Peace and Accountability Act to specifically include provisions that would allow the imposition of sanctions on traders, officials, and armed leaders benefitting from the conflict-affected gold trade from Darfur.

   Additionally, members of Congress should introduce language that spells out how Sudan's gold trade is conflict-affected and a major factor in destabilizing Darfur, especially in light of its connection to Musa Hilal, who is on the U.S. sanctions list. This language could be incorporated in an existing legislative vehicle on Sudan or on a stand-alone basis. In it, Congress should call on banks and gold refiners to red-flag Sudanese gold as high-risk, and for gold industry associations to include Sudan as a high-risk country in their conflict-free audits, in order to ascertain what gold exports from Sudan are conflict-affected.

4. **Encourage greater industry due diligence:** The U.S. Department of State's Bureau of Economic and Business Affairs should urge the OECD Multi-Stakeholder Group on Responsible Mineral Supply Chains, the CFSI, the LBMA, and the RJC to make sure that their various auditors designate Sudanese gold as high-risk when conducting conflict-free audits. Given the consolidation of all gold mined in Sudan by the Central Bank, all exports coming from the country should be considered high risk-for connections to conflict at present. Specifically, both the LBMA and the DMCC should avoid adding Sudan's state-owned refinery to good delivery lists.

   Since the Emirates remains the most important destination for gold from Sudan, the U.S. Department of State should place special attention on urging Emirati authorities to

pursue regulatory reforms. U.S. economic officers should engage the Emirates bilaterally to urge officials to tighten import controls on gold from Sudan. Specifically, the Emirates government and the DMCC should require that any imports from Sudan are documented with invoices stating the consignees, certificates of origin, and proof of original export taxes paid. U.S. diplomats should also urge the Emirates to eliminate the hand-carry rule that allows smugglers to carry in large amounts of gold with limited scrutiny.

For their part, industry auditors from the LBMA, RJC, and CFSI should red-flag Sudan's gold exports as conflict-affected during conflict-free audits, and require refiners to conduct additional due diligence and trace all gold coming from Sudan to its mine of origin to ensure that such purchases are not inadvertently fueling war in Darfur, Blue Nile, or South Kordofan. The gold industry's existing responsible sourcing auditing programs are attempting to address conflict-affected supply chains from the Democratic Republic of the Congo. The same scrutiny should be applied to Sudan. This would thereby reduce the market value that any conflict-affected Sudanese gold can command.

Endnotes

[1] Omer Ismail and Akshaya Kumar, "Darfur's Gold Rush: State-Sponsored Atrocities 10 Years After the Genocide" (Washington: The Enough Project, May 2013), available at http://www.enoughproject.org/files/Darfur_Gold_Rush.pdf.

[2] On Blue Nile, see Steven Spittaels and Yannick Weyns, "Mapping Conflict Motives: the Sudan-South Sudan border" (Antwerp: International Peace Information Service, January 2014), available at https://docs.google.com/viewer?url=http://ipisresearch.eu/download.php?id%3D440 and Africa Intelligence, "Gold a target for SAF and SPLM-N in south," March 4, 2014, available by subscription at http://www.africaintelligence.com/AMA/exploration-production/2014/03/04/gold-a-target-for-saf-and-splm-n-in-south,108010586-ART.

[3] For more on Musa Hilal, see Rebecca Hamilton, "The Monster of Darfur," New Republic, December 3, 2009, available at http://www.newrepublic.com/article/economy/the-monster-darfur.

[4] Under U.N. Security Council Resolution 1591, the Security Council may impose asset freezes and travel bans on those "who impede the peace process, constitute a threat to stability in Darfur and the region, commit violations of international humanitarian or human rights law or other atrocities, violate the measures implemented by resolution 1556 (2004)… or are responsible for offensive military overflights." U.N. Security Council, "Resolution 1591 (2005) Adopted by the Security Council at its 5153rd meeting, on 29 March 2005," S/RES/1591 (2005), para. 3(c), March 29, 2005, available at http://www.un.org/ga/search/view_doc.asp?symbol=S/RES/1591%20(2005). See also narrative summary for the designation of Musa Hilal: U.N. Security Council Committee established pursuant to resolution 1591 (2005) concerning the Sudan, "Narrative Summaries of Reasons for Listing," available at http://www.un.org/sc/committees/1591/SDi002.shtml (last accessed March 2015).

[5] Hilal is listed on the Office of Foreign Asset Control's list of Specially Designated Nationals, available at http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx (last accessed March 2015). Under Executive Order 13400, the U.S. Department of the Treasury may impose sanctions on those it finds "to have constituted a threat to the peace process in Darfur; to have constituted a threat to stability in Darfur and the region; to be responsible for conduct related to the conflict in Darfur that violates international law; to be responsible for heinous conduct with respect to human life or limb related to the conflict in Darfur; to have directly or indirectly supplied, sold, or transferred arms or any related materiel, or any assistance, advice, or training related to military activities to the Government of Sudan, the Sudan Liberation Movement/Army, the Justice and Equality Movement, the Janjaweed; or any person (other than a person listed in subparagraph (E)(1) through (E)(4) above) operating in the states of North Darfur, South Darfur, or West Darfur that is a belligerent, a nongovernmental entity, or an individual; to be responsible for offensive military overflights in and over the Darfur region; or to have materially assisted, sponsored, or provided financial, materiel, or technological support for, or goods or services in support of, the activities described in paragraph (a)(ii)(A) through (F) of this section or any person listed in or designated pursuant to this order; or to be owned or controlled by, or acting or purporting to act for or on behalf of, directly or indirectly, any person listed in or designated pursuant to this order." Executive Order no. 13,400, *Code of Federal Regulations*, title 3 (May 1, 2006), available at http://www.treasury.gov/resource-center/sanctions/Documents/13400.pdf.

[6] For criteria of red-flagged gold, see Organization for Economic Cooperation and Development, "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas," 2nd ed., 2013, p. 79, available at http://www.oecd.org/corporate/mne/GuidanceEdition2.pdf.

[7] This figure was provided by the Sudanese minerals minister, Ahmed Mohamed Sadiq al-Karouri, in July 2014. The Economist Intelligence Unit, Sudan economy, "Report confirms large mineral deposits in Sudan," October 13, 2014, available at http://webcache.googleusercontent.com/search?q=cache:W4hhiJKWYO4J:country.eiu.com/article.aspx%3Farticleid%3D1022378686%26Country%3DSudan%26topic%3DEconomy%26subtopic%3DForecast%26subsubtopic%3DExternal%2Bsector+&cd=1&hl=en&ct=clnk&gl=us.

[8] Ulf Laessing, "Gold last hope for Sudan to avert economic collapse," Reuters, July 2012, available at http://www.reuters.com/article/2012/07/18/us-sudan-gold-idUSBRE86H0SX20120718; also see photographs by Mohamed Nureldin Abdallah for Reuters, The Telegraph, "The hard life of Sudan's gold miners," available at http://www.telegraph.co.uk/news/picturegalleries/worldnews/10213065/The-hard-life-of-Sudans-gold-miners.html (last accessed March 2015).

[9] Osman M. S M.,"The contribution of Minerals to the GDP in Sudan" Ministry of Mining Working papers on the Role of Mining Sector in the GDP, Khartoum Sudan, (in Arabic), 2013.

[10] Africa Confidential, "Egyptians return in search of gold," November 30, 2012, available by subscription at http://www.africa-confidential.com/article-preview/id/4701/Egyptians_return_in_search_of_gold; photographs by Mohamed Nureldin Abdallah for Reuters, Globe and Mail, "Sudan's Hassai gold mine," September 30, 2011, available at http://www.theglobeandmail.com/report-on-business/international-business/sudans-hassai-gold-mine/article639307/; Northern Miner, "La Mancha planning second life for Hassai," December 7, 2012, available at http://www.northernminer.com/news/la-mancha-planning-second-life-for-hassai/1000746169/?&er=NA.

[11] Reuters, "Morocco's Managem eyes annual gold output of 12 t in Sudan – Suna," The Maghreb Daily ("Le Mag"), February 22, 2013, available at http://www.lemag.ma/english/Morocco-s-Managem-eyes-annual-gold-output-of-12-t-in-Sudan-Suna_a3380.html; Managem, "Exploration activities in Sudan," available at http://www.mineafrica.com/documents/3%20H.Nabil_Exploration%20Activities%20of%20Managem%20in%20Sudan_AMC%202014.pdf.

[12] Alawia al-Khalifa, "Traditional Mining: Poverty Alleviation vs. Environment Pollution," *Sudan Vision*, August 19, 2014, available at http://news.sudanvisiondaily.com/details.html?rsnpid=239340; Sudan News

Agency, "A grant of 200 thousand dollars to conduct study on impact of traditional mining in the Sudan," January 28, 2015, available at http://suna-sd.net/suna/showNews/232457/en.

[13] Ulf Laessing, "The Darfur conflict's deadly gold rush," Reuters, October 8, 2013, available at http://www.reuters.com/article/2013/10/08/us-sudan-darfur-gold-idUSBRE99707G20131008, Jérôme Tubiana, "Out for Gold and Blood in Sudan," *Foreign Affairs*, May 1, 2014, available at http://www.foreignaffairs.com/features/letters-from/out-for-gold-and-blood-in-sudan and also at http://www.crisisgroup.org/en/regions/africa/horn-of-africa/sudan/op-eds/tubiana-out-for-gold-and-blood-in-sudan.aspx.

[14] Sudan Tribune, "Sudan Predicted to Be Africa's Largest Gold Producer By 2018," AllAfrica.com, July 7, 2014, available at http://allafrica.com/stories/201407081069.html; International Monetary Fund, "Sudan: 2014 Article IV Consultation and Second Review under Staff-Monitored Program—Staff Report; Press Releases; and Statement by the Executive Director for Sudan," December 2014, available at http://www.imf.org/external/pubs/ft/scr/2014/cr14364.pdf.

[15] Sudan News Agency, "Sudan Produces 73.3 Tons of Gold," *Sudanow Magazine*, January 28, 2015, available at http://sudanow.info.sd/sudan-produces-73-3-tons-of-gold/.

[16] Sudan Vision, "1 Million Citizens Working in Traditional Mining in Sudan," January 28, 2015, available at http://news.sudanvisiondaily.com/details.html?rsnpid=245576.

[17] Tubiana, "Out for Gold and Blood in Sudan"; Ismail and Kumar, "Darfur's Gold Rush."

[18] Radio Dabanga, "Musa Hilal's Council forms 'Jebel 'Amer Administration,' calls for intifada in Sudan," December 16, 2014, available at https://www.dabangasudan.org/en/all-news/article/musa-hilal-s-council-forms-jebel-amer-administration-calls-for-intifada-in-sudan.

[19] U.N. Security Council Committee established pursuant to resolution 1591 (2005) concerning the Sudan, "Narrative Summaries of Reasons for Listing," available at http://www.un.org/sc/committees/1591/SDi002.shtml (last accessed March 2015).

[20] Ismail and Kumar, "Darfur's Gold Rush."

[21] Laessing, "The Darfur conflict's deadly gold rush."

[22] Radio Dabanga, "Abbala-Beni Hussein treaty 'good for North Darfur agriculture': Minister," July 30, 2013, available at https://www.dabangasudan.org/en/all-news/article/abbala-beni-hussein-treaty-good-for-north-darfur-agriculture-minister; Radio Dabanga, "Casualties as Abbala gold miners clash in Jebel 'Amer, North Darfur," October 1, 2013, available at https://www.dabangasudan.org/en/all-news/article/casualties-as-abbala-gold-miners-clash-in-jebel-amer-north-darfur; Radio Dabanga, "Sudanese army deployed 'to enforce peace in Jebel 'Amer,'" August 6, 2013, available at https://www.dabangasudan.org/en/all-news/article/sudanese-army-deployed-to-enforce-peace-in-jebel-amer.

[23] Sudan Tribune, "Ex-Janjaweed leader sponsors tribal reconciliation conference in North Darfur," September 27, 2014, available at http://www.sudantribune.com/spip.php?article52540.

[24] Radio Dabanga, "'Gold tax to recompense 839 Abbala-Beni Hussein dead': North Darfur Minister," August 22, 2013, available at https://www.dabangasudan.org/en/all-news/article/gold-tax-to-recompense-839-abbala-beni-hussein-dead-north-darfur-minister.

[25] Ashorooq, "MAM and MINAS awarded concessions in Jebel Amer," April 8, 2014, available at http://www.ashorooq.net/index.php?option=com_content&view=article&id=38588:qq-qq-&catid=35:2008-07-30-07-04-03&Itemid=1191 (translation by author). See also Radio Dabanga, "Darfur concession winner warned off by Hilal," April 17, 2014, available at https://www.dabangasudan.org/en/all-news/article/darfur-gold-concession-winner-warned-off-by-hilal.

[26] Radio Dabanga, "Musa Hilal's Council forms 'Jebel 'Amer Administration,' calls for intifada in Sudan."

[27] Sudaress, interview with Mohammed Hamdan, commander of the border guard, April 26, 2013, (Arabic source; translation to English by author), available at http://www.sudaress.com/alrakoba/96092.

[28] U.N. Security Council, "Final report of the Panel of Experts submitted in accordance with paragraph 2 of resolution 2138 (2014)," S/2015/31, January 16, 2015, available at http://www.un.org/ga/search/view_doc.asp?symbol=S/2015/31.

[29] U.N. Security Council, "Resolution 2200 (2015) Adopted by the Security Council at its 7380th meeting, on 12 February 2015," S/RES/2200 (2015), February 12, 2015, available at http://www.un.org/en/ga/search/view_doc.asp?symbol=S/RES/2200%20%282015%29.
[30] Spittaels and Weyns, "Mapping Conflict Motives: the Sudan - South Sudan border," p. 38.
[31] Ibid.
[32] Ibid.
[33] Ibid, p. 24.
[34] Ibid, p. 23. Spittaels and Weyns note that several of the mines do not operate because of proximity to the front lines of conflict and targeting in air strikes by the Sudan Armed Forces.
[35] Ibid, pp. 23-24.
[36] Republic of the Sudan, Sudanese Ministry of Minerals, "Gold Refinery," http://www.minerals.gov.sd/Eng/Gold_Refinery.htm (last accessed March 2015).
[37] Sudan Tribune, "Sudan's central bank places moratorium on gold ore exports," December 13, 2012, available at http://www.sudantribune.com/spip.php?article44842; Sudan Tribune, "Sudan's central bank restricts gold imports & exports," June 8, 2013, available at http://sudantribune.com/spip.php?article46859.
[38] Katrina Manson, "Sudan looks to fill coffers with gold," *Financial Times*, July 17, 2012, available at http://www.ft.com/intl/cms/s/0/8a16b73e-7dca-11e3-95dd-00144feabdc0.html; Katrina Manson, "Rage against the regime," *Financial Times*, January 15, 2014, available at http://www.ft.com/intl/cms/s/0/40fe5280-cc34-11e1-839a-00144feabdc0.html#axzz3SoYatMxC; International Monetary Fund, "Sudan: 2014 Article IV Consultation"; Africa Confidential, "The new gold rush," November 30, 2012, available by subscription at http://www.africa-confidential.com/article/id/4700/The_new_gold_rush.
[39] Manson, "Sudan looks to fill coffers with gold"; Africa Confidential, "The new gold rush."
[40] International Monetary Fund, "Sudan: 2014 Article IV Consultation," para. 32, pp. 15-16.
[41] Details from U.N. Comtrade Database, available at http://comtrade.un.org/data/. See also U.S. Department of the Interior U.S. Geological Survey, "2012 Minerals Yearbook: Sudan," March 2014, available at http://minerals.usgs.gov/minerals/pubs/country/2012/myb3-2012-su.pdf; Global Witness, "City of Gold: Why Dubai's first conflict gold audit never saw the light of day" (London: February 2014), available at http://www.globalwitness.org/sites/default/files/library/dubai_gold_layout_lr.pdf.
[42] Sudan Vision, "Gold Production, Export Increases," January 21, 2015, available at http://news.sudanvisiondaily.com/details.html?rsnpid=245310.
[43] International Monetary Fund, "Sudan: 2014 Article IV Consultation."
[44] Ibid.
[45] Radio Dabanga, "'Sudan regime keeps to its principles': Al Bashir," September 28, 2014, available at https://www.dabangasudan.org/en/all-news/article/sudan-regime-keeps-to-its-principles-al-bashir.
[46] Sudan Tribune, "Sudan Predicted to Be Africa's Largest Gold Producer By 2018"; Sudan News Agency, "Sudan Produces 73.3 Tons of Gold."
[47] International Monetary Fund, "Sudan: 2014 Article IV Consultation," para. 18, p. 9.
[48] International Monetary Fund, "Sudan: 2014 Article IV Consultation."
[49] Ibid.
[50] Ibid.
[51] Ibid.
[52] Sudan News Agency, "Sudan Produces 73.3 Tons of Gold."
[53] Linette Lopez, "The Turkish Corruption Scandal Involves An Explosive Gas For Gold Deal With Iran," Business Insider, December 27, 2013, available at http://www.businessinsider.com/turkey-gas-for-gold-deal-with-iran-2013-12; Asli Kandemir, "Turkey to Iran gold trade wiped out by new U.S. sanction," Reuters, February 15, 2013, available at http://www.reuters.com/article/2013/02/15/us-iran-turkey-sanctions-idUSBRE91E0IN20130215.

[54] London Bullion Market Association, "LBMA Responsible Gold Guidance," version 5, January 18, 2013, available at http://www.lbma.org.uk/assets/market/gdl/RGG20130118_v5.pdf.
[55] Responsible Jewellery Council, "Chain-of-Custody (CoC) Certification Handbook," March 2012, available at http://www.responsiblejewellery.com/files/G003_2012_RJC_CoC_Cert_Handbook_PM.pdf.
[56] Conflict Free Sourcing Initiative, Responsible Practices to Identify Sources of Conflict Minerals, http://www.conflictfreesourcing.org/media/docs/CFSI_DD_ReasonablePracticesforDownstreamCompanies_Aug2013.pdf
[57] Chirag Sharma, "DMCC Responsible Sourcing Initiatives," Dubai Multi Commodities Center, Dubai Precious Metals Conference, April 6, 2013, available at http://www.dpmc.ae/dpmc2013/Presentation/3Masterclass_Responsble_sourcing_Chirag_Sharma_DMCC.pdf.
[58] Price Waterhouse Cooper, "Conflict minerals: Frequently asked questions," available at http://www.pwc.com/us/en/audit-assurance-services/conflict-minerals-faqs.jhtml (last accessed March 2015).
[59] Organization for Economic Cooperation and Development, "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-affected and High-risk Areas: Supplement on Gold," available at http://www.oecd.org/corporate/mne/GoldSupplement.pdf.
[60] Partnership Africa Canada, "All that Glitters is Not Gold: Dubai, Congo and the Illicit Trade of Conflict Minerals" (Ottawa: May 2014), available at http://www.pacweb.org/images/PUBLICATIONS/All%20That%20Glitters.pdf. See also Ruben de Koning and the Enough Team, "Striking Gold: How M23 and its Allies are Infiltrating Congo's Gold Trade" (Washington: The Enough Project, October 2013), available at http://www.enoughproject.org/files/StrikingGold-M23-and-Allies-Infiltrating-Congo-Gold-Trade.pdf.
[61] U.N. Security Council, "Resolution 2198 (2015) Adopted by the Security Council at its 7371st meeting, on 29 January 2015," S/RES/2198 (2015), para. 5(g), January 29, 2015, available at http://www.un.org/en/ga/search/view_doc.asp?symbol=S/RES/2198%20(2015).
[62] U.N. Security Council, "Resolution 1591 (2005)."
[63] Executive Order 13400.