‘Partnering for better livelihoods in the gold supply chain’

Overall conclusions and recommendations – final report
The background to this report

Improving livelihoods in mining communities: a short introduction

Globally, artisanal and small-scale mine (ASM) workers generally work under severe and unsafe labour conditions. Earnings are usually low, the health of workers is frequently at stake, and the nearby communities often suffer from pollution from these mines.

To tackle these challenges, Solidaridad implements various programmes related to the gold supply chain covering 26 mining communities in eight countries. The ‘partnering for better livelihoods in the gold supply chain’ programme is part of Solidaridad’s activities in the gold supply chain. The programme was implemented from December 2013 to March 2017 in Ghana and Peru. The key objective of this programme is improving livelihoods in mining communities on four aspects:
1) Improved health and safer working conditions;
2) Increased income;
3) Reduced use of mercury;
4) Improved social position.

Solidaridad used a comprehensive approach to address challenges for mines, mine workers and community members. This was done in close collaboration with the mines, local government and community members. More specifically, Solidaridad and its programme partners:
• provided personal protection equipment (PPE) and safety information to the miners.
• trained and provided technical assistance to ASM mines (Ghana) and miners (Peru) on occupational health and safety in order to prepare them for certification (Ghana).
• guided artisanal and small-scale miners associations (ASMOs) in the process of formalisation (Peru).
• assisted a midscale mine with operating responsibly and in line with RJC criteria, thereby increasing their volume of traceable gold (Peru).
• linked the midscale mine with international buyers (Peru).
• supported two communities near the mines (in Ghana). Activities included forming Water and Sanitation Committees (WATSAN), women empowerment groups, training, awareness campaigns on health issues and establishing a community health facility.
Implementing a gold programme in Ghana and Peru

Different contexts

The programme targets ASM and mid-scale mines in Peru and Ghana. The situations at these mines differ. We identified five key differences in contexts:

- **Alluvial versus drift mining:** In Ghana, the focus was on small-scale mines that engage in alluvial mining. In Peru, the focus was on a mid-scale mine and the ASM miners on their concession, which all engage in drift mining.
- **With and without usage of cyanide:** The mid-scale mine in Peru has a plant in which gold is extracted with the use of cyanide. Cyanide is not used by small-scale mines in Ghana.
- **The difference between ASM mines and ASM miners:** The company structure of the mines varies between the two countries, especially when you look at the definition of ASM. To emphasize this difference, we refer to ASM mines in the case of Ghana and ASM miners in the case of Peru. The ASM mines in Ghana are small-scale mining companies that are up to 25 acres. In Peru, ASM miners have a designated working area in which they work alone or with a few other miners that they subcontract. They are often much smaller in terms of investment, number of employees and scale of production than the small-scale mines in Ghana.
- **Legislation:** The governments of Ghana and Peru approach regulation of the mining sector differently. In Ghana, a new government was elected in 2016. They have taken hard measures to tackle challenges caused by mining. At the time of fieldwork, they actively banned illegal mining, and at the time of reporting, all small-scale mining activities were banned for six months. This has put the targeted mines temporarily out of operation. In Peru, new legislation was introduced in 2012 to further regulate the ASM sector (see next point).
- **Certification versus formalisation:** The programme responded to changes in the policy environment. ASM miners in Peru were supported in a process called formalisation, which helped them meet new legislation criteria. One mid-scale mine in Peru was supported in acquiring RJC certification, which also helped them to adjust to legislation criteria. Three ASM mines in Ghana were supported in working toward Fairmined certification.

*Source: Afiwa district council

**PROGRAMME FACTS & FIGURES**

‘Partnering for better livelihoods in the gold supply chain’ was implemented in 2013–2017 in Ghana and Peru. In Peru, 1 mid-scale mine with 145 direct employees and 674 subcontracted workers was supported in order to acquire RJC certification: Minera Yanaquihua SAC (MYSAC)

594 ASM miners from 3 ASM associations received training on safer and healthier working practices:

- ASMACER
- ASTRAMINA
- AMACCI

Moreover, 137 women who collect low-grade ore (pallaqueras) were supported in the process of becoming legally registered and received a grinding machine, PPE, and training.

In Ghana, 3 mines with 117 workers were taken through a module to prepare them for Fairmined certification:

- Key Empire
- Gold Bank Resources
- EK Agyemang Mining Group

Community activities in Ghana:

- One community health facility was established that serves 1,625 people.*
- 2 women’s groups were formed and trained on women’s empowerment.
- 2 WATSAN groups were formed and trained on health, water, and sanitation.
- 600 posters and 600 leaflets on health and safety were distributed.

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Research methodology

Evaluation approach
For this final term evaluation, we used a theory based research design. The focus of theory based evaluations is understanding the change, rather than proving the change happened. The approach acknowledges the complex reality in which multiple factors influence the outcomes of an intervention. The design does not allow us to solely attribute changes to the intervention, but it does allow us to explain how changes in livelihoods at community level were brought about.

Our analytical approach is based on contribution analysis. The essence of this approach is to pose a clear causal question and develop a detailed theory of change that includes the causal pathway on the basis of it. Building on these causal pathways, rival explanations for the change are developed. Evidence (pro or con) is subsequently collected for each of the explanations. This leads to a nuanced claim about the contribution of the intervention and possible other factors to the observed changes. At the same time, it provides insight in the mechanism that led to the changes.

Methodology
The end evaluation seeks to answer the following research question:

How (if at all) has the situation of the beneficiaries of the gold programme changed on the outcome and impact levels due to the ‘Partnering for better livelihoods in the gold supply chain’ programme?

In 2015, Avance conducted a baseline study for Ghana and a retrospective baseline and midterm evaluation for Peru. The results of the end evaluation are compared to the baseline and midterm results. We used the same methodology for the different measurements. We adopted a mixed-method approach, which included a survey, focus group discussions, group interviews and interviews with key informants.

During the end evaluation, we gave more emphasis to understanding and learning from the changes with the beneficiaries. Therefore, sense-making sessions were held at the mines, ASM associations (ASMO), and communities and the Solidaridad offices. These sessions gave insight into the relation between changes that were identified during the field research. Moreover, these sessions provided space to reflect on what can be learned from the programme.

LEARNING QUESTIONS OF THE EVALUATION

This report reflects on what can be learned from comparing the programme results from Peru and Ghana. What can we conclude when looking at the similarities and differences of the results in the two countries? We will look at four learning questions:

Relevance: To what extent have the programme interventions corresponded to the requirements of target groups, the national contexts, and the global supply chain?

Effectiveness: To what extent has the programme attained its objectives and expected results?

Sustainability: To what extent can the programme be considered sustainable with regards to continuation of the programme’s results now that the programme has ended?

Lessons learned and recommendations: What are the lessons learned for further improvement, adaption, or further expansion of the gold programme?

Evaluation process

1. Desk research and baseline for Ghana and mid-term review with retrospective baseline for Peru (2013–2015)

2. Survey with miners (representative sample)
   • 172 respondents in Peru
   • 75 respondents in Ghana

3. Focus group discussions in 3 communities
   (Ghana):
   • 6 focus group discussions with 66 respondents

4. First data analysis

5. Discussion of first findings during sense-making sessions at mines, contractors, ASMO, communities and Solidaridad
   • 88 participants during 7 sessions in Peru
   • 27 participants during 5 sessions in Ghana

6. Group interviews and key informant interviews
   with stakeholders and programme staff:
   • 13 respondents in Peru
   • 12 respondents in Ghana

7. Second data-analysis

8. Development of country reports

9. Development of overall report
A highly relevant programme

Linking to political urgencies
The programme was implemented at a time when great attention was paid to solving the challenges caused by ASM mining. In Ghana as well as Peru, mining is a conflictive sector in which protests are recurrent and have sometimes even resulted in deaths. The governments of Peru and Ghana have looked for measures that can be taken to address legalization, environmental damage, inadequate working conditions, and tax evasion by ASM miners or mines. This has led to policy measures to which ASM mine[r]s now have to adhere.

Providing practical solutions
Solidaridad provided practical solutions to challenges in ASM mining using standard certification guidelines and legal standards. Such guidelines and standards are relatively new and unknown in the countries, but are also scalable. This is particularly important, because governments are not providing practical solutions nor the necessary guidance and financial support that is needed to ensure responsible mining and adhere to new legislation. The Solidaridad programme filled this gap by assisting the ASM miners with formalisation (Peru), preparing them for certification (Ghana) and providing them with training and PPEs to achieve safer and healthier working conditions. This has helped the miners to reorganize their work processes and improve safety, health, and environmental conditions according to legal/certification standards. Thus, the programme has piloted with practical and scalable solutions for pressing problems.

‘The most important thing I learned during training was about mercury. I didn’t know it can sit on your hair and you can carry it to your family at home. So now we teach others about this.’
Lead miner, Ghana

‘The gold programme and RJC certification “have accelerated the process” of working in a socially and environmentally more responsible way since “it helped to establish goals and put everything in order”.’
Former MYSAC director during midterm review 2015, Peru

Recommendation 1: Collaborate with existing networks to promote practical solutions for responsible small-scale and artisanal mining
Solidaridad piloted with practical solutions to challenges in ASM mining, particularly in regards to experiences with certification guidelines, promoting the use of PPEs, and legal standards, which are concrete and scalable. Collaborating with existing networks to share experiences on benefits and challenges with these standards is an important next step in making responsible practices the norm for small-scale mines. Examples include national networks, such as ASM federations, international networks, such as the Alliance for Responsible Mining. If there are no existing networks, Solidaridad can establish new commissions or set up public – private partnerships to support the development of new legislation, regulation and programmes.

Creating focus on health and safety
The programme activities are perceived by the mine workers as highly relevant, particularly when it comes to health and safety measures. Sometimes it took a while before mine workers saw the relevance of activities. This was particularly the case for knowledge on mercury and the use of protective equipment. On these topics, mine workers report that the new information is eye-opening for them. Consequently, they feel the need to protect themselves and further share the knowledge.
Effectively improving health

The overall objective of the programme was to improve livelihoods in mining communities. Has the programme been effective in reaching its long-term and impact targets? In this section, we will reflect on the four main areas in which change took place at the impact level (see also the figure on the next page)

1) Some influence on income:
We observed mixed effects on income. There was an increase in income for all mine workers and ASM miners in Peru. In Ghana, income increased for workers at some mines, whereas at other mines, it stayed the same. There are two reasons for the mixed effects of the programme on the incomes of workers: First, some mines did not experience an increase in income, which resulted in no increase in wages for mine workers. Some mines do acknowledge the positive effects on the income of their mines, but this does not always outweigh the costs. Managers of Gold Bank in Ghana and MYSAC in Peru explained that the programme has helped them manage their mines more efficiently. This allowed them to increase wages and attract and retain more professional and motivated staff. However, all mine managers emphasize that there are also additional costs involved in responsible mining practices. Second, external factors such as the prices of fuel and gold are more important in determining the incomes of mines and ASM miners.

2) Improved health and safety of workers and community members:
The programme made a clear contribution to the improvement of both health and safety. In particular, the use of protective equipment by workers increased because of the programme. According to the informants as well as our observation, the combination of provision of protective equipment, training miners, and installing safety signs and posters was the key driver for significant health and safety improvements.

From our research, we can conclude that both in Ghana as well as in Peru mines now pay more attention to safety at the mining sites as a result of the training and technical assistance. This has contributed to a reduction in occupational hazards (knowledge of an accident at the mine went from 55% to 16% in Ghana) as well as a reduction in the number of sick days (from 7 to 3 days in Ghana and 5 to 4 days in Peru) for the great majority of miners.

*The figure is different from the results framework and reflects on the observed changes. The major differences are as follows: We found that one result (reduced mercury use) contributed to changes at the impact level (improved health and safety) and has therefore moved to the outcome level. Another indicator (women’s empowerment) was formulated on the outcome level, but as it deals with a change in livelihood for women, it was moved to the impact level. The indicator “social position” was not clearly defined at the start of the programme. We focused on the change in the relation between miners and communities because the programme made an important contribution to this.

Recommendation 2: Offer clear alternatives for mercury

There are good alternatives to the use of mercury, but knowledge on how to do this is still limited among ASM miners. Therefore, future interventions can focus on building the capacity of ASM miners to switch to mercury-free production. This can be done by stimulating the exchange between ASM miners who have started to use cleaner gold production techniques and do not use mercury or use it to a much lesser extent with ASM miners that still use mercury. This can be combined with trainings and technical assistance on applying these alternative production methods as well as access to financial resources to buy the necessary machinery and tools.

An important achievement is that in both countries, the use of mercury was reduced considerably. Additionally, mercury is now handled in a safer manner than previously. Although it is difficult to estimate the effect of this on the health of workers and community members, this is likely to have contributed to healthier workers and communities in the long run. The reduction and safer use of mercury was achieved through awareness-raising trainings on the negative effects of mercury on health and the environment. Moreover, the provision of PPE helped mine workers to use mercury more safely when mercury was still in use. Finally, one mine in Ghana received guidance in the switch to mercury-free production. They had already begun the transition to mercury-free production prior to the launch of the programme. They indicated that the support of Solidaridad was crucial for adopting good practices, which increased their productivity. In Peru, external factors were important as well, such as legislation and the disincentive of no longer buying contaminated tailings from ASM miners. This stimulated miners to look for cleaner gold production techniques.

In Ghana, the program also attempted to improve the health situation in communities near the mines. Access to health care was improved due to the construction of a health facility. At the same time, awareness raising and training contributed to the prevention of diseases. For instance, community members report that they now use bed nets to protect against disease-carrying mosquitoes and are also more aware of the risks of mercury. Changes in behaviour should not be exclusively attributed to Solidaridad. In the case of malaria prevention, respondents indicated that it was important that they received a bed net via a government programme.
A better relationship to the communities

3) Better relationship between miners and communities:
The relationship of miners with community members has improved. The programme contributed
to this in various ways. In Ghana, Solidaridad and the mines jointly invested in two communities
near the mines. For instance, through the establishment of a health facility. This was highly
appreciated by community members. Moreover, Solidaridad stepped in to mediate when
tension between communities and the ASM mines/miners arose. The improvements cannot all be
attributed to the programme as the mines in both countries invested in communities outside of
the programme as well, which improved the relationship between the mine and the community.

4) Women have slightly better opportunities in the communities:
The programme contributed to improving the position of women in two communities in Ghana in
two ways. First, women groups received training on leadership. Participants emphasized this
helped them take up leadership roles in the community. Second, women groups were trained on
village savings and loans (VSLA) and soap production as an alternative livelihood. These activities
are done as a group. Some women have generated income from the alternative livelihood
activities, because they can sell the soap produced by the group enterprise on commission.

Recommendation 3: More focus on women’s empowerment related to mining
There is the potential and need to strengthen the position of women in the mining sector. In
both countries, women who work in mining engage in the low-paid informal jobs, such as
collecting low-grade ore from leftovers. Improving the position of women within mines requires
strategic interventions like awareness-raising trainings on the importance of women within
mining and occupational trainings for the women. The latter can help women to acquire the
necessary skills for higher paid mining jobs. At the same time, practical interventions can be
implemented, such as access to financing for women who work in mining, access to tools (e.g.,
through a sharing system), and a day care for young children who do not go to school yet.

‘We live in harmony with them because of the intervention with Solidaridad. Without the project this would have been different. Mines [in general] destroy our lands and have a lot of uncovered pits, which is a death trap for children. Solidaridad has helped us tell Key Empire to do reclamation.’
Community member, Ghana

Some objectives were not achieved
In both countries, certain objectives were not reached. This was particularly the case for the
following objectives:

• Building the capacity of one ASM to attain the midscale status: Originally, the programme
targeted midscale mines in Ghana, but Solidaridad could not find midscale mines to
participate since Ghanaian law does not yet acknowledge midscale mining. This is expected
to change soon as the minerals commission is writing a proposal to adjust the law. Since no
midscale mines could be found, Solidaridad formulated a new objective: building the
capacity of a small-scale mine to attain midscale status. Since changing the law is taking
longer than expected however, this objective was not achieved. It is likely that one of the
mines has the capacity to attain midscale status, but the definition of what constitutes a
midscale mine is not yet known. Therefore, it is impossible to define this objective.

• The formalisation of ASMOs: In Peru, one ASMO has gone through all stages of the
formalisation process. The government is not yet ready to revise all documentation and
officially provide the formal status. The fact that all ASMO working on the MYSAC concession
have started the formalisation process is, however, a positive result of the programme.

• Increasing the volume of traceable gold: The production from the mines is not yet sold on the
market as certified and traceable gold. In Peru, the mine is RJC certified and linked to
international buyers. However, buyers are not willing to pay the extra price of RJC-certified
gold (fully responsible and traceable), as the final step in the refined gold production is done
by a company that is not certified. In Ghana no mines have been certified yet.

Effectiveness 8
A business case?

Many of the programme objectives were reached, but is there a business case to be made? The evidence is mixed. In the case of RJC certification for mid-scale mines, the business case is clear. MYSAC has increased its gold production and income, made its work methods more efficient and now has greater control over its concession due to a climate of good neighbourliness with the ASM associations. Additionally, both MYSAC and the ASMO have reduced their negative environmental and social impact.

Regarding ASM, the results suggest that it is still difficult for ASM mines and miners to fully transition to responsible and formal mining without external financial and knowledge support. The reason for this is the level of investment required for the programme. Responsible mining practices are costly for ASM miners because of the investments needed in protective equipment, training programmes, reclamation of the land and new equipment to reduce the use of mercury. There is no clear evidence yet that these investments outweigh the (financial) benefits.

In addition to the costs, it is also difficult to convince mining companies to invest in responsible mining. First, it is uncertain how much income the ASM miners will generate from the mining area. When a mine is still starting up in an area, they may not be willing to make any ‘unnecessary’ investments. Second, certifications like RJC or Fairmined are relatively rare in both countries, and mines are not aware of the potential benefits. Therefore, it is difficult to persuade ASM mine owners to make large investments in responsible mining.

Government pressure is increasingly strengthening the business case for the programme. In both countries, investing in responsible mining and formalisation can be increasingly seen as a way to distinguishing themselves from illegal or informal mining. The programme provides clear guidelines on how to produce responsibly and which steps have to be taken for formalisation, thus it can be seen as a good tool to achieve this. As a result ASM mine(r)s can work without the risk of being prosecuted and receiving a better payment for their product (although some distrust is still present).

**BENEFITS AND COSTS OF THE PROGRAMME**

**Proven benefits**
- Clear and practical guidelines for responsible mining
- Being able to present the company as a responsible brand
- Avoid falling into illegality or to get out of informality
- Achieve social returns on investment
- More efficient production processes (evidence at some mines)

**Potential benefits**
- Access to better markets
- Premium for Fairmined certification

**Costs and challenges**
- Some practices are very costly
- Difficult to convince mines to invest in responsible mining because:
  - Mining is a risky business
  - Responsible small-scale mining is still new / uncommon

In short, it will be challenging to convince ASM miners to make the investments that are required for the transition to responsible mining on their own. However, as government pressure is growing, ASM mine(r)s face the risk of legal measures if they do not go through the transition to responsible or formal mining. When this happens, investment in responsible mining will become inevitable. In this case, the tools of the programme can serve as good guidelines towards formal and responsible mining.

‘Illegal miners don’t have licences. Small scale mines are allowed to work, but many people don’t understand because they don’t see the difference. This is a challenge for mines. For instance, people who rent out equipment will not rent to small-scale mines because they think everybody is illegal.’

Representative of the minerals commission, Ghana
The contribution of the programme

One of the learning questions of this evaluation was: How much of the achieved changes are due to the programme’s intervention? This deals with the issue of “contribution”. Both the programme and external factors were important drivers in the transition to responsible mining practices (see figure below). The role of Solidaridad was particularly important in two areas:

1) Solidaridad provided guidance and a set of practical solutions that can be used by mines.
2) Solidaridad or the mine has provided the means for implementing these solutions. For instance, Solidaridad invested in PPEs and training for the mine workers. The mid-scale mine in Peru also invested in PPEs training of the mine workers.

External factors have been important drivers for change as well. These external factors might have led to some changes without the programme as well. In this case, the programme has been key in facilitating the transition to responsible mining. For instance, in Peru, legislation was the main driver for ASM miners to make the first steps towards formalisation, but the programme enabled ASMOs to understand the requirements and even brought one ASMO to the final step in the process. Additionally, in Ghana, mine owners were aware of the importance of reclamation (closing mining pits after exploitation) as they observed increasing pressure from the government and international policy bodies. The programme stimulated the mines to engage in better practices for reclamation, with which soil fertility is restored.

EXTERNAL FACTORS FACILITATING AND LIMITATING SUCCESS

Factors facilitating achievement of goals:

- **Solidaridad**: providing practical solutions, the means of implementation, having a fixed team of experts on the topic as well as budget available.
- **Governmental level**: updated mining legislation and constructive pressure from the government.
- **Mines**: motivation to be a frontrunner in responsible mining; interest in responsible mining prior to the programme and the willingness of mines to invest in responsible mining.
- **ASMO**: The fact that ASM miners are united in associations facilitates negotiation processes and provision of support (Peru).

Factors limiting the potential for success:

- **Governmental level**: the lack of human and financial resources governments dedicate to support mines and miners; continuous changes in legislation, timeframes, and governmental staff.
- **Mines**: staff turnover at the mines, especially in management positions or due to the relocation of mining sites, and financial challenges at the mine.
- **Culture**: The mining sector is a conflictive sector. Many focus on earning as much money as they can. Few efforts are made to establish good relationships, and this often leads to conflicts. Also, there were differences in opinions between ASMO members.
The sustainability of the programme results

Changing the company culture
The mines worked on pulling structures in place to continue implementing the results of the programme, leading to institutional ownership of the programme at the mines. In both countries this can be described as a change in company culture. In the case of the MYSAC mine in Peru, leadership was already socially and environmentally sensitive, but managed to institutionalize a yearly training program as well as two fixed staff positions for ASM formalisation support and community relations. In Ghana, the mines incorporated safety measures into standard practices such as introduction trainings for new employees and short daily meetings.

The following factors contributed to changing the company culture towards more responsible mining and creating institutional ownership in both countries:

• Train everybody at the mines, including support staff. Everybody needs to be on board if you want to change the culture of a company. Support staff may be very helpful in instructing or reminding others about safety practices.

• Create visual elements that remind people of safety, like safety signs and posters. This way, staff members are always reminded of what they learned during the trainings. These visual elements have also been perceived as useful in explaining safety practices to new staff.

• Provide PPEs. With these materials, staff and ASM miners can put what they have learned during the trainings into practice and turn this new practice into a habit.

• Work through existing structures, such as staff introduction and morning meetings. It is easier for mines to adjust existing activities than adopt new activities.

The importance of groups
In both countries, group structures are present that favour sustainability of the programme results. Some groups are stronger in terms of group cohesion and level of activity than others. In Peru, the ASM miners were already united in associations (ASMOS) prior to the programme. The programme has strengthened them by passing on information and knowledge, supporting them in negotiation processes, conducting topographic plans of their work areas, getting a group legally registered and providing material for their meeting place. In Ghana, the programme targeted inactive groups or formed new groups. Although the group structures are in place, it is not likely that all groups will continue their activities if they don’t receive additional support. Particularly in one community, it was a challenge to activate the group as group cohesion was low and the mine relocated to a new area. They might dissolve now that the programme is finished, as they have not yet fully appropriated the activities.

The group formation is key for receiving support from any NGO, governmental institution or company after the programme. Additional support can help the groups grow stronger, particularly in Ghana. For instance, the women’s groups is actively involved in soap making as a group enterprise, which gives them an incentive to continue their activities. In particular, plans to upscale their production under a government programme and thereby generate more income from the enterprise is motivating this group.

Recommendation 4: Strengthen activities with community groups
Progress has been made with the communities in both countries, including specific women and WATSAN groups. Nevertheless, as they are relatively new, the sustainability of these groups may be a challenge. Additional guidance and support may help them grow (more) independently. In addition, more work could be done with the human settlements in Peru to improve the livelihoods for ASM miners living there as they often do not even have access to basic services like potable water. This requires most of all an improved communication between the different actors. Finally, when targeting new mines it is recommended to target communities where the mine is expected to stay in the area for some years. This way, the mine can also be involved in community activities, also after the programme ends.

A team of experts
Another level of institutional ownership is at the regional Solidaridad offices of South America and West Africa. Both offices have been implementing a series of gold projects and will continue to do so as part of the overall Solidaridad “gold programme” using the already established technical and financial base.
Financial sustainability

The importance of certification for financial sustainability
Solidaridad implemented activities in order to support mines in complying with Fairmined or RJC certification. One mine already succeeded in getting certified. Attaining these labels is key for the financial sustainability of the programme results at the other mines for the following reasons:

• Investment in responsible mining and keeping a good relationship with the communities and ASM miners on their concession, has become part of the core business of the mine in Peru and for at least one mine in Ghana.
• The mines have to undergo audits and therefore have an incentive to comply with standards.
• Being certified helps mines market themselves as frontrunners when it comes to responsible mining, especially since not many mines are certified yet in either one of the countries. It is important for the mining companies to establish a good reputation.
• Mines can get access to more remunerative markets and can get a premium when they are certified. This will give the mines the opportunity to acquire an additional income which they can re-invest in responsible mining.

When looking at the abovementioned factors, it becomes clear that there are differences in terms of financial sustainability between Peru and Ghana. In Peru the mine is already certified. The financial sustainability of the programme results is guaranteed in Peru due to the fact that complying with RJC certification, working with ASM miners, and maintaining a good relationship with communities has become part of the core business of MYsAC. They will continue to provide follow-up to these main elements of the programme with their own financial resources in order to keep RJC certification. In Ghana, certification does not guarantee financial sustainability yet. Nevertheless, mine owners express a willingness to continue investing in responsible mining. They see the benefits of investing in practices such as providing PPEs and reclamation, because it benefits their workers and helps them build a relationship with the community.

‘People don’t know the difference between small-scale miners and illegal miners. But we have legal documents. Even security personnel [from the government] comes and tells us we have to stop mining. They try to intimidate us, but we keep working.’

Mine manager, Ghana (prior to the ban on small-scale mining)

Responsible mining to prevent falling into illegality
Some of the achieved changes are likely to be sustainable, because mines see it as a way to distinguish themselves from illegal or informal miners. In Peru, new legislation stimulated ASM miners to work towards formalisation and the mid-scale mine to acquire RJC certification. In Ghana, mine owners and mine management mentioned they saw practices such as reclamation as an important way to demonstrate that they are different from illegal mining. However, at the time of writing this report the Ghanaian government had banned ASM temporarily, thus obstructing the positive progress of those ASM mines that were open to Fairmined certification. The policy environment in Peru has been more supportive to create sustainable programme results.

Recommendation 5: Provide access to financial resources so mines and ASMO can invest in responsible mining
The programme has the potential to benefit the mines financially. However, it requires that the mines make the necessary investments for transforming their company into a responsible brand. For instance, producing without mercury can help mines access better markets. However, a mine needs to invest in new machinery and training of staff in order to make this possible. Therefore, access to financial resources is a requirement for helping small-scale mines adopt high-investment, responsible practices. Access to finance is another challenge for small-scale mining. The programme could establish links to banks and micro-finance institutions to develop specific financial products for these ASM mines/miners.
Best practices and lessons learned

1. Certification can play an important role in increasing the incomes of mines, which improves the financial sustainability of the programme. However, getting certified takes time. Certification helps mines integrate responsible mining practices into their core business, and certified mines can market their company as a responsible brand. Moreover, they can access more remunerative markets and receive a premium. Yet the experiences in this programme show that it takes time to get certified and to actually benefit from new markets. In Ghana, the mines did not manage to get certified during the programme. In Peru, the mine has been RJC certified since 2014, but the new markets and premium incomes were not yet achieved. A longer programme duration or faster implementation of certification could optimize the financial results.

2. National policies and government pressure have a strong influence on the decision to convert to formal and responsible mining. In both countries, the high policy relevance contributed to the dedication of the mines to transition to responsible and legal mining practices. Solidaridad has stepped in by providing access to information, training, guidance, and financial resources, which are necessary to implement the required changes.

**Recommendation 6: Influence national government to provide the necessary support to ASM and midscale mines to comply with legislation**

The programme provided support to and practical solutions for the mines. In order for this to be sustainable, governments should be more involved in implementing responsible mining practices. This can be done through offering practical solutions and sensitization on issues like the importance of appointing sufficient and capable staff to provide the necessary trainings and assistance. Additionally, Solidaridad can lobby for increased resources to support those mines that are not able to finance the changes themselves.

3. The integrated approach of the programme has been very successful in improving health and safety conditions for the miners. The combination of training, the provision of protective equipment, and installing safety signs has really resulted in improved health and safety conditions. Provision alone is not enough however; workers are more likely to wear protective equipment if they understand why this is important. Safety signs can be seen as a reminder and help to integrate the use of safety equipment into the company culture.

4. Solidaridad can play an important role as a mediator between the community and the mine. In Ghana, Solidaridad gained trust in the communities and had frequent interaction with the community members. This put them in a position where they could resolve friction and prevent conflict. This is an important extra benefit of implementing activities at both the mine and the community. Solidaridad played the role of mediator as well in Peru, although to a lesser extent.

**Recommendation 7: Focus on communication and third-party intermediation between the different stakeholders.**

The mining sector is often very conflictive. Negotiations between the different stakeholders (ASM miners, mid-scale mines, communities, or the government) are often entered into with an all-or-nothing mentality. Solidaridad and other programme allies can play a key role as objective third-party intermediaries and can introduce new communication models that focus on shared interests and win-win situations. This should be included in the results framework from the start.

5. Working through existing structures makes it easier to create institutional ownership. Solidaridad intentionally trained the mineworkers to integrate safety practices into their existing activities. This has made it easier for mines to integrate activities into their daily practices. For instance, safety training is now included in the introduction and follow-up trainings at the mines in both Peru and Ghana. Additionally, the fact that ASM miners in Peru were already united in associations also made it easier to provide them with support in their formalisation process. This resulted in a more responsible way of mining for an already existent institution.

6. In order to change a company culture, everybody has to be involved. Responsible mining is not about changing some of the company’s practices; it is about changing the company culture. To achieve this, all staff needs to understand why change within the company is important and how to make it happen. All employees play a role in achieving change as staff can remind each other of good practices and also train new staff.