

**Independent Assessment of the General Laws  
Amendment Bill - Illicit Mining and the related  
Socio-Economic Impact Assessment (SEIA's)  
report.**

**3 November 2023**



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## **1. Introduction**

This research project aims to unearth solutions to deal with illegal mining. Illegal mining is a serious problem facing the South African mining industry. As per the Mineral and Petroleum Resources Development Act 28 of 2002 (MPRDA), any mining and related activities conducted without the required statutory authorisation (Section 5(4)) is deemed to be illegal mining. It is therefore illegal to possess unwrought precious metal ore or any other mineral bearing material without the relevant authorisation.

Illegal mining activities are part of an international syndicate managed and coordinated by well-resourced global criminal syndicates. The actual individuals conducting the illegal mining activities known as Zama Zama's in South Africa are skilled miners heavily armed terrorizing the communities in which their illegal operations are conducted.

Several factors contribute to the existence of illegal mining activities in South Africa, these include socio-economic challenges which compels young men to work in dangerous abandoned mines and at operating mines. South Africa is estimated to host over 6 000 derelict and abandoned mines. Furthermore, there are limited resources to enable law enforcement agencies to stop illegal mining. These challenges are compounded by challenges with illegal immigration and inadequate border controls.

## **2. Problem Statement**

There are increasing incidents of illegal mining in the country. These activities claimed lives of many communities who reside closer to areas where illegal mining occurs and live in fear due to associated criminalities. Illegal mining activities often involve the theft and destruction of mining infrastructure, such as machinery, pipelines, and power lines. Municipalities are affected as there are sink holes damaging roads. The cost of repairing and rebuilding this infrastructure further adds to the economic hardship experienced by these municipalities. There are over 6 000 abandoned mines that are not rehabilitated and prone to these activities.

This research project's primary objective is to conduct an independent assessment of the socio-economic impact of the proposed General Laws Amendment Bill for Illicit

Mining and to also improve the SEIAS report produced by the Department of Mineral Resources and Energy (DMRE). The research will also identify alternatives to holistically address the challenges of illegal mining, provide expert opinion on solutions to be considered in mitigating the adverse impacts associated with illegal mining in order to empower Principals with evidence-based decision making

### **3. Scope of work**

Conduct an independent in-depth analysis on the socio-economic impact of the proposed General laws Amendment Bill for Illicit Mining and to also improve the SEIAS report produced by the Department of Mineral Resources and Energy (DMRE). In addition, analyse whether the General Laws Amendment Bill for Illicit Mining will contribute to the reduction of illicit mining; and identify other alternatives to holistically address the challenges of illegal mining. Additional research will be provided confined to the following research areas:

1. Solutions to stop Illegal mining.
2. Expanding the content of the SEIAs report submitted by the DMRE.
3. Provide additional inputs to assist with evidence-based decision making for the Principals.

### **4. Research Methodology**

The research project will rely on both qualitative and quantitative research techniques. There's a plethora of research material that has been conducted relating to managing illegal mining. This research material will be utilised along with expert interviews where required.

### **5. Actual Deliverables**

Review report (15 pages maximum) presenting findings and recommendations in a template format provided by PRS.

## **6. Whether the General Laws Amendment Bill and the related SEIA's report for Illicit Mining will contribute to the reduction of illicit mining.**

### **6.1 The illicit mining value chain and crime preventive measures.**

The South African mining industry is currently overwhelmed with illicit activities within its mining value chain. The major challenge is illegal mining occurring in operating and abandoned and or derelict gold operations in the Free State and Gauteng Province. Illegal diamond mining takes place in the Northern Cape in previously mined areas in addition there is an increase of illegal chrome mining in the North West and Limpopo provinces. These operations are well funded by local and international syndicates who have the technical and financial capacity to fund illegal operations and a market exists for the commodities they produce.

In the Gauteng province illegal mining occurs largely in the East and West Rand of Gauteng with a lot of illegal activities taking place in the Anglo-Gold Ashanti operations now owned by Harmony Gold Operations mainly Kusasaletu, at Sibanye- Stillwater's Cooke, Kloof and Driefontein operations and Harmony's Kusasaletu gold mines, as well as in the Roodepoort, Benoni, Riverlea and Florida areas.

Several illegal gold mining activities are currently taking place in the KwaZulu-Natal Province. Recently a raid took place in a mine shaft in Kortnek in Pongola where illegal mining had become the norm and a flourishing industry had been initiated. During the raid, law enforcement officers discovered gold crushing equipment, explosives, cutting torches, gas cylinders and various mining tools. Other areas affected by illegal mining in KZN include Klipwal and Hammarsdale. In the Limpopo Province, the majority of illegal mining activities is in the Atok and Steelport area where chrome is found. The illicit mining value chain is comprised of a number of individuals, companies and processes, mainly;

- **Illegal miners:** Firstly, they are illegal miners who conduct the dangerous work of extracting and even processing minerals under harsh conditions. These illegal workers are usually comprised of illegal immigrants who have been

brought into South Africa specially to conduct illegal mining activities. Arrests of illegal miners show that these immigrants are from neighbouring countries, such as Lesotho, Mozambique and Zimbabwe.

It is no surprise that these individuals come from these countries as these were historical mine worker recruiting areas by TEBA (Pty) Ltd established in the early 1900's to recruit mineworkers for South Africa's gold mining industry. It is not surprising to identify that historical formal mining networks are being used by illegal miners from neighbouring countries. These networks are used to provide access to actual places being mined, a place to stay and a gang to be incorporated into.

- **Bulk buyers:** These are the individuals and companies who purchase illegally mined material and through various means are able to mix the illegally derived minerals with those minerals that are mined legally. These buyers are equipped with all the required logistics and licenses and permits which enable them to export the illegally mined produced to international destinations.
- **Criminal syndicates:** The operationalisation of illegal mining is supported by other criminal elements which include **human trafficking** and smuggling as illegal miners are smuggled illegally into the country. **Money laundering** is a big factor as illegal money derived from other criminal activities is utilised to fund the purchase of mining equipment including the purchase of human beings and weapons. Illegal mining enables money to be concealed from its origins. **Illegal weapons** are used in illegal mining activities these weapons are usually brought in from neighbouring countries. The weapons include stolen guns, explosives and large calibre firepower stolen and or taken from law enforcement agencies and from ordinary citizens. **Violent crime** emanates from illegal mining activities as gangs underground fight for territory to mine and on surface illegal miners terrorize members of the communities where illegal mining takes place. The processing of illegal mined materials using unconventional unregulated mineral processing methods **degrades the environment**. The regional impact of illegal mining can be explained as a **transnational organized criminal activity** which leads to a variety of undetected **customs offences** and **tax evasion**.

### 6.1.1 Human trafficking and people smuggling

It is important to differentiate between people smuggling and human trafficking. People smuggling is an act that is characterized by the fact that the person being smuggled gives consent to be smuggled into a particular country. It is illegal migration and an individual choice often done in search of better socio-economic conditions elsewhere or running away from conflict especially from war torn countries. Human trafficking is the actual trade in human beings usually to compel people into sexual slavery and or several forms of forced labour such as illegal mining and criminal activities. Human trafficking occurs within a country or trans nationally.

South Africa is struggling with various forms of human trafficking these forms include sex trafficking, child labour, domestic servitude, organ smuggling, child-brides illegal child adoptions, debt-bondage, forced surrogacy, and the use of body parts for muti. South Africa's porous borders has made it a primary source and destination and transit country for human trafficking. Even more disturbing is that human trafficking occurs internally between South Africa's nine provinces. The majority of illegal miners are victims with economically poorer backgrounds and the associated socio-economic challenges. Most illegal miners are sourced from the Southern African Development Community (SADC).

Human trafficking for illegal mining activities obtains their victims specifically for that purpose while the general practise is that human trafficking is channelled through the tourism industry, cultural and religious practices, illegal sex trade and the drug trade. The risk profile of victims is comprised of young males often with a low educational but literate background sourced from poor communities seeking work and are trained to mine, carry mining equipment and to use several weapons. Other underlying features which support the increase in human trafficking to support illegal mining activities are challenges experienced by law enforcement agencies especially border crossing patrols, a modern and sophisticated internet, telephone, financial and banking system enables human trafficking to flourish. Some challenges faced by stakeholders when fighting' and mitigating and or preventing human trafficking include:

- Inadequate research and support to fight human trafficking there seems to be a denial that human trafficking is big and on the increase in South Africa.
- Victims are not supported but in most cases are blamed for their misfortune especially those exploited by traffickers when they seek employment opportunities, romantic partners, study and travel opportunities and those who seek better socio-economic conditions.
- Inadequately resourced law enforcement personnel burdened by and overworked as a result of crime and a lack of sufficient resources to prosecute those who are engaged in human trafficking.

### 6.1.2 Money laundering

Money laundering involves various illegal processes put together in order to conceal the origins of money. Criminals find the need to conceal the origination of the funds as this is normally money generated from illegal activities such as drug trafficking, corruption, embezzlement, prostitution and gambling. This is a key operation of organized crime as its primary objective is to convert illegal money into a legitimate source. South Africa's primary legislation to prevent money laundering is the Financial Intelligence Centre Act (FICA) Act 38 of 2001 established to assist in fighting financial crimes which include money laundering. The financing of terrorist activities, and to protect banking customers from such crimes.

In addition, the Foreign Account Tax and Compliance Act (FATCA) and Common Reporting Standard (CRS) is a legislation in the United States used to identify American Tax Residents abroad. South Africa elected to participate in FATCA by signing up through an Inter-Governmental Agreement (IGA). This requires South African banks to obtain a customer's Tax Residency and report any customer who is tax resident in the US to SARS who will then on report it to the US Revenue Authority. The CRS is a standard agreed to by several revenue authorities around the world to share information with regards to preventing tax evasion and tax fraud. South Africa as a jurisdiction has decided to participate in this standard, this requires the Bank to obtain Tax Residency information of its Account Holders and share this information with SARS.



CRS obligations are imposed on South African financial institutions. The CRS Regulations were issued under the Tax Administration Act, 2011 (TAA). The CRS implementing legislation requires that the model CRS must be applied consistently with the Organisation for Economic Cooperation and Development (OECD).

To be effective the battle against money laundering needs to not only consider investigating money laundering activities but also the actual crimes it is linked to. This will enable the government to deal with the sources of money laundering. Investigations to be focused on identifying the origins, flows and whereabouts of illicit income in order to detect the networks involved in order to freeze or confiscate assets from the perpetrators of both the original offences and the subsequent money launders to be prosecuted.

### 6.1.3 Terrorism financing

Several measures have been put in place by South Africa to combat money laundering and in some cases fight against terrorist financing. The challenge has been South Africa's inability to pursue serious crimes even though the country has a good legal framework directed at fighting crime. South Africa is a Southern Africa regional financial hub and also a member of the Group of 20 (G20). The G20 is an intergovernmental forum comprising 19 sovereign countries, the European Union (EU), and the African Union (AU). It is primarily focused on global economic cooperation and other related issues such as international financial stability, climate change mitigation and sustainable development.

South Africa has a modern financial system which exposes it to laundering of domestic crime proceeds and foreign crime proceeds from the SADC region. South Africa is also exposed to terrorism financing and potential domestic terrorism. There is a strong connection between terrorism financing and funding of illegal mining activities. Terrorism funding in relation to the domestic mining sector can be described as emanating from a variety of activities such as kidnapping of people who are then forced to conduct illegal mining activities on behalf of international syndicates, the exploitation

of South Africa's communities, the illicit trade of minerals such as gold, diamonds, chrome and other minerals.

Illegal miners fall within the broader ambit of terrorism as they unlawfully use violence and intimidation tactics against civilians, disregard the rule of law in pursuit of economic and political objectives. The economic objectives are clear these being making money from illegal mining activities while the political objectives are violent efforts aimed at compelling the South Africa government and civilians to support and to allow illegal mining to flourish.

Terrorism financing is the provision of funds or providing financial support to individual terrorists or non-state actors. Financing of illegal mining activities is synonymous with terrorism financing involving the following four stages of terrorist financing, collecting, storing, moving and using;

- **Collecting:** The generation of funds from various illegal sources in the illegal mining context these funds emanate from a number of illegal activities.
- **Storing:** Storing the funds in cash or other assets. In the illegal mining context money is used to purchase mining equipment such as explosives, drilling equipment and mineral processing equipment. In addition, the funds are also used to purchase weapons used to terrorise communities and other miners mining legally on surface and underground.
- **Moving:** The transfer of funds across borders or within a country. In the illegal mining context money is transferred in the SADC region in order to fund and recruit illegal miners and cross border crime activities such as combining of illegally mined minerals with legally mined minerals to enable it to be exported legally to foreign markets.
- **Using:** The allocation of funds to support terrorist acts or organizations. In the illegal mining context funds are rechannelled to fund the entire illegal mining value chain and to support illegal mining organizations.

#### 6.1.4 Proliferation of illegal weapons

The illegal possession of a firearm is a term given for possessing a firearm without a valid licence, registration certificate, or authorization. This is for non-restricted,

restricted and prohibited firearms and well as prohibited devices and ammunition. South Africa's Firearms Control Act 60 of 2000 regulates the possession of firearms by civilians. The are four main sources of illegal firearms in South Africa mainly conflict guns, cross-border trafficking, diversion of legal guns held by civilians and the state (police, military and other government departments) and legal guns used illegally.

In South Africa alone approximately 15 000 people were arrested for possessing illegal firearms in 2022. Illegal firearms are difficult to detect as their outside of any control making them highly valuable for criminals and criminal activity because they cannot be traced. The latter hinders the ability to conduct adequate research on illegal firearms and the nature of the illegal firearms trade.

#### 6.1.5 Violent crime in South Africa

South Africa has high rates of violent crimes when compared to other countries especially having one of the highest murder rates in the world. Organised crimes are also prevalent and these are attributed to high levels of poverty, wealth disparity and porous borders. Other notable features contributing to high rates of violent crimes in South Africa include long standing socio-economic and psychological problems that have been experienced by criminals often uncaring and bad early childhood environments and with most young men having not been offered the correct guardianship. Other factors which contribute to violent and non-violent crime include the following:

- **The normalisation of violence in South Africa** has become acceptable with many people choosing to invest in security instead of dealing with the root causes of violence. Even aggrieved citizens tend to resort to violence during service delivery protests.
- **A known subculture characterized by gangs** who terrorize the community, gangs formed by people who sell drugs and other illegal substances and gangs who are formed by people who organise the themselves to conduct crime such as housebreaking and hijackings. This subculture has been accepted in a number of communities as it has been

seen as a way young desperate men organise themselves to make a living or hustling.

- **Young people easily fall into the culture of criminality** as it is perceived as a way of life in certain communities. It has also become a well-known fact that even South Africa's neighbouring countries perceive South Africa as an easy target. A country easy to get into illegally, commit crime and either escape or get a light jail term. Some young people cannot escape criminal risk factors and are easily drawn into criminal activities.
- **The consumption of narcotics and abuse of alcohol** is a big contributing factor as criminals use substances to remove any fear in the minds before engaging in criminal activity.
- **The inability of South Africa's criminal justice system** to be able to manage highly complex criminal networks. These inadequacies have prevented the implementation of the effective policing proposals as enshrined in the National Development Plan 2030. The NDP called for a modernised, transformed and efficient criminal justice system and a professional and highly skilled police service.
- Recent challenges with illegal mining activities in hotspots in the East Rand and West Rand in Gauteng and the Free State illustrate that the local police stations are ill equipped to deal with illegal activities emanating from the mining industry. Most of these police stations are already overwhelmed with other criminal matters.
- Operational challenges are a big challenge as when an illegal mineworker is apprehended, the criminal would have broken several laws this makes it very difficult to prosecute. Illegal mineworkers are usually only charged with trespassing and theft.

#### 6.1.6 Environmental pollution

South Africa is faced with several challenges to the maintenance of system integrity and functioning specifically a lack of coordination, accountability, capacity, skills and resources to ensure effective natural resource management. Some of these

challenges relate to achieving socially equitable governance, institutional capacity, adaptability and flexibility. The specific challenges faced by South Africa as a result of environmental challenges include and are not limited to the following:

- Water pollution from poorly treated or untreated sewage, industrial and pharmaceutical wastewater, which affects the health of the population and the wildlife, and contributes to water scarcity.
- Air pollution from vehicle emissions, coal-fired power plants, and mining activities, which causes respiratory diseases, acid rain, and greenhouse gas emissions.
- Land degradation from soil erosion, desertification, and loss of biodiversity, which reduces the agricultural productivity and the natural resources of the country.
- Solid waste pollution from inadequate waste management, illegal dumping, and littering, which contaminates the land and water, and poses a threat to human and animal health.
- Deforestation from logging, urbanization, and agriculture, which destroys the habitats of many species, and reduces the carbon sequestration and oxygen production of the forests

Illegal mining is contributing to water pollution the exposure to water and air of rock ore containing sulphides leading to the formation of sulphuric acid and other dangerous products harmful to the environment. Drainage from illegal mining operations tend to runoff streams or rivers or leach into groundwater entering the underground water systems further adding into the Acid Mine Drainage (AMD) challenge that is already a problem. AMD is becoming even more problematic as illegal mineworkers are reopening old mine shafts that had been closed and rehabilitated.

Section 19 of South Africa's National Water Act deals with the prevention and remedying the effects of water pollution by a land user for any activity which **"...causes, has caused or is likely to cause pollution of a water resource, must take all reasonable measures to prevent any such pollution from occurring, continuing or recurring"**. Such person/land user company if they do not comply then the Department of Water and Sanitation "...may recover all costs incurred as a result of" having to implement remedial steps to deal with any resulting pollution due

to non-compliance to a departmental directive under Section 19. It is impossible to impose this piece of legislation on illegal mining activities as these activities are illegal.

#### 6.1.7 Transnational organized crime (TOC)

Transnational organized crime (TOC) is organized crime, adequately financed and coordinated across different national borders, involving groups or markets of individuals working in more than one country to plan and execute illegal business activities. TOC relies on systematic violence and corruption mainly focusing on the following criminal activities; conveying drugs, conveying arms, trafficking for sex, illegal mining, toxic waste disposal, materials theft and poaching.

South Africa's inability to deal effectively with TOC has turned it into a narcotics transit country. South Africa has become a centre of global commerce for illegal imports and smuggled goods. Its modern banking system has enabled money laundering to continue although money laundering controls are in place the complexity lies in the fact that illegitimate trade is mixed with legitimate trade.

The perpetrators of TOC are closely connected often sharing intelligence, smuggling routes, networks with citizens, operatives and technology. The Southern African Development Community (SADC) is working on a comprehensive strategy to identify, understand and combat transnational organised crime in the region with separate protocols and strategies across the SADC members to address cross-border threats including the smuggling of weapons, drugs and wildlife, illicit financial outflows, illegal mining and as well as human trafficking.

A single strategy to deal with this scourge was developed in 2004 as SADC's Strategic Indicative Plan for the Organ on Defence, Politics and Security, which advises member states on regional challenges and responses. A regional crime combating plan was devised in 2018 by the Southern African Regional Police Chiefs Cooperation Organisation (SARPCCO).

#### 6.1.8 Customs Offenses

The Customs and Excise Act 91 of 1964 governs legal customs activities. South Africa is faced with a fast paced and ever-changing trading environment with a big focus on

the export of minerals. Customs agencies require the relevant capacity to be able to manage and respond effectively. People need not contravene or fail to comply with any of the **Customs and Excise Act** it is considered as committing a customs offence and a deposit for a possible contravention can then be charged by the relevant authority. A person can decide to lodge a dispute against the customs offence or penalty imposed.

#### 6.1.9 Tax Evasion

Tax evasion is an illegal attempt to defeat the imposition of taxes by individuals, corporations, trusts, and others. Tax evasion happens when there's deliberate misrepresentation of the taxpayer's affairs to the tax authorities to reduce the taxpayer's tax liability.

### 7. Conclusion and Recommendations to the Principals

South Africa's illegal mining problem is a direct result of growing criminality in the country. The illicit mining value chain survives and thrives as it has a well-funded network comprised of a number of individuals, companies and processes. This illegal network operates successfully in South Africa as it is relying on human trafficking, money laundering, violent crime, pollution of the environment, transnational organised crime, customs offences and tax evasion.

In order to deal effectively with illegal mining, it is recommended that the South African government works in an integrated manner in order to implement the following recommendations:

#### 1. Human trafficking

- A focused campaign in collaboration with the SADC members states to investigate human trafficking organisations operating within the SADC region, within South Africa and in mining towns.
- South Africa needs to run human trafficking awareness campaigns especially in those areas where illegal mining is prevalent or areas deemed to be hot spots by reaching out to the general public, schools, religious organisations, businesses and advocacy campaigns.
- Concerted effort needs to be geared towards ensuring the successful prosecution for human trafficking related crimes. Dedicated training will

have to be provided and the required technical assistance to law enforcement officials, such as police, prosecutors and judges.

## **2. Money laundering**

- A focused campaign in collaboration with the SADC member states to investigate money laundering activities, the sharing of financial intelligence within the SADC region, within South Africa and in mining towns.
- Coordinated intelligence gathering, sharing and communication on a regular basis especially for financial institutions to identify and discuss trends and ever-changing methods being utilised to circumvent all money laundering mitigation measures. This is to ensure that banks and law enforcement agencies keep each other updated at all times in identifying possible money laundering networks.

## **3. Violent crime**

- Safety is a human right this then compels all crime preventing strategies in mining towns resulting from illegal mining activities to concentrate all efforts on enforcing security measures to achieving a safe living environment for all. Security focuses on protection against anticipated threats while safety lays emphasis on removing elements which create fear and danger within our society.
- To achieve a peaceful living environment, it is necessary to tackle the root causes of violent crime and crime in general. This requires coordinated efforts using technology to reach every member of a mining community affected by illegal mining.
- Creating localised programmes at ward level directed at the elements that are drivers of violence and crime. Examples that can be considered can be demarcating certain wards as gun-free zones, arresting people who sell clothes and food to illegal miners.



#### **4. Illegal weapons**

- Mining towns need to be designated as gun free zones where only law enforcement officers are allowed to be in possession and use guns. These law enforcement officers include members of the SAPS, SANDF and mine security service personnel. Limiting the availability of guns will also decrease gun related criminal activity which is a big part of illegal mining. To achieve the later, the following will have to be considered:
  - Harsh penalties for those who deal and supply illegal firearms in order to deter illegal gun possession.
  - Reduce gun carrying in public places as quiet often legal guns are stolen or taken away from their legal owners to be used to commit crimes.
  - Reduce demand for firearms, this requires people to feel safe so they do not need to buy firearms to protect themselves.
  - Promote responsible ownership of guns.
  - Address community conditions that foster gun crime.

#### **5. Environmental pollution**

- Involve community structures and members in the closing and rehabilitation of illegal mining sites to create awareness that these sites shouldn't be operational and teaching the community about illegal mining's negative impact on the environment.
- Close and reclaim abandoned and derelict mines, collaborate with community structures and mining houses to band together to employ efforts to protect the environment.

#### **6. Transnational organised crime**

- Illegal mining regional networks are known as illegal miners when captured their places of origin are easily identified coupled with where their recruited and illegally captured from usually from Lesotho, Zimbabwe and Mozambique.
  - Therefore, South Africa and other law enforcement agencies should target transnational criminal networks that pose the greatest threat to

national security, by targeting their infrastructures, depriving them of their enabling means, and preventing the criminal facilitation of illegal mining activities in the countries where transactional crime is initiated from.

## **7. Customs offences**

- Ensure effective auditing of the complete cycle of customs related mining transactions.
- Get complete records of all the mineral products produced before they are signed off to be exported. These should include production schedules and proof of production including the funding sources.

## **8. Tax evasion**

- Regular training for staff on financial crime detection and prevention is required to prevent the illegal act of concealing or misreporting income to avoid paying taxes.
- Efforts to investigate and prosecute those involved in the criminal facilitation of tax evasion.
- Clear reporting procedures for whistle blowing of suspected tax fraud. Whistle blowing protection to be in place, whistle blowers to be offered the opportunity to remain anonymous.
- Forcing errant sovereign nations to share information about tax avoidance.



# **Green Strike**

Livelihoods & Analytics

*'Measured Collaborative Outcomes'*