

# Illicit Flows of Gold Concentrates

## In the Maritime Space

(Summary based on OECD Report, Dec 2025)

### What can policymakers do?

Illicit financial flows through the trade of raw ores and concentrates divert funds to criminal actors and deprive producing countries of vital tax revenues. Governments may consider taking targeted action to address these vulnerabilities and strengthen oversight of the sector through a number of strategies:

#### **Train personnel of competent authorities in the nature and trade of raw ores and concentrates.**

This includes building the capacity of customs and other law enforcement personnel to identify ores and concentrates, understand how the supply chain works, and detect typologies of crime related to these commodities. This requires training in how to analyse maritime shipping documents related to concentrates, such as bills of lading, customs declarations, and ship manifests.

#### **Assert clear control and strengthen customs**

enforcement at port facilities that export gold ore and concentrate. Where international companies, either owned by other states or privately held, control these port facilities, require full data disclosure to regulators and law enforcement, and mandate unrestricted access to their operations and outgoing cargoes. Equip customs facilities in major ports for raw ores and concentrates with the means for assaying cargoes. X-ray fluorescence (XRF) guns, which are often used by customs personnel to quickly assess the gold content of gold bars, recycled gold, or gold jewellery, are ineffective for raw ore or concentrate. Installing fire assays capacity at key port facilities will allow for detection of mis-declared or mis-invoiced shipments.

#### **Conduct systematic or random assays of other**

mineral concentrates for gold content. Testing cargoes of mineral concentrates such as silver, copper, manganese, and zinc for their gold content as well as their content of high-value by-product minerals can enhance detection rates and help deter fraud.

#### **Enhance national trade nomenclatures to improve**

data on gold concentrate flows, reduce the latitude for misrepresentation and help isolate and target the types of concentrate where fraud is the most prevalent. This could be done by instituting new national subdivisions at the eight-digit level within HS code 261690 in line with WCO guidelines on maintaining coherence.

#### **Take steps to ensure customs duties reflect the value of by-product minerals.**

Given that high-value minerals, including critical minerals and rare earth elements, can be found in gold ore and concentrate (as well as other ores and concentrates), customs authorities can mandate complete declaration of mineral contents in a shipment, with fees specific to each high-value mineral.

#### **Establish and enforce more rigorous licensing and monitoring of initial processing plants', traders', and smelters' traceability and due diligence practices.**

This includes strict licensing regimes that include rigorous monitoring and reporting – including in line with OECD Guidance expectations – for initial processing plants and traders, which buy and blend raw ore or process it into concentrate. Similar licensing and monitoring regimes would need to apply to smelters that receive concentrates.

Facilitate co-operation, including information sharing, among law enforcement agencies of origin, transit, and destination countries. Illicit flows of ores and concentrates are invariably a transnational problem, and need to be addressed through international co-operation and co-ordination, both using available mechanisms such as joint customs operations and establishing new avenues of communication and collaboration.

### What can the private sector do?

Given the persistent blind spots and potential vulnerabilities in gold concentrate supply chains, companies should treat the presence of such materials as a high-risk indicator. Where a company identifies gold concentrates in its supply chain, it is encouraged to prioritise due diligence measures to identify, address, and account for potential and actual risks of adverse impacts.

All entities in the gold and copper supply chains, particularly processing plants, traders, smelters and their customers, should conduct due diligence in line with the OECD Guidance. As part of their due diligence process, they should make sure their management systems are equipped to identify actual and potential risks of adverse impacts linked to gold concentrates, continuously monitor, put in place mitigation measures where relevant, and report publicly – particularly on risk identification and mitigation.

**Note: For more details scan the QR code or Bullion World website for the complete document**



In particular, companies should ensure that their systems of control and transparency of the supply chain, including traceability systems as relevant, are capable of detecting discrepancies, vulnerabilities, and indicators warranting enhanced due diligence specific to gold concentrates. Where appropriate, they should carry out on-the-ground assessments, plausibility checks and controls of due diligence systems of mines, beneficiation plants, exporters, smelters and refiners. Verification initiatives like due diligence audit schemes should review and, where necessary, update the scope of their assurance processes to capture vulnerabilities linked to concentrates. This includes initiatives in both gold and copper supply chains.

The shipping industry should contribute to oversight of ore and concentrate shipments. Through the major trade associations – including BIMCO, INTERCARGO, ICS and WSC – shippers should explore the possibility of a code of conduct to help identify and prevent use of commercial vessels to transport illicit gold and other precious metals.

Companies sourcing copper and other base metal concentrates containing gold are encouraged to refer to the **OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations** to accurately establish a price for mineral sales (OECD, 2022[22]). In addition, further guidance on payable metal rates and thresholds are set out in the **OECD/IGF Transfer Pricing Framework for Copper Toolkit (OECD/IGF, Forthcoming[23])**.

