

AFRICAN GOLD REPORT

KENYA

MAY 26, 2025

This document is part of a larger research project on African gold flows. For information on data sources, methodology or recommendations, please refer to SWISSAID's 2024 report [On the trail of African gold](#).

COUNTRY TYPE

Main characteristics: medium-sized gold producer (according to African standards), extraction mainly through artisanal and small-scale mining, regional hub with both inbound and outbound illicit gold flows, origin of part of the smuggled gold imported into Dubai.

Gold production

- Artisanal and small-scale mining
 - declared: none
 - non-declared (estimate): 6.9 tonnes per year on average, according to an estimate based on field data collected in 2019
- Industrial or large-scale mining (based on the local understanding of those terms): 410 kg in 2023

Gold imports

- Declared: 385 kg in 2023 (according to mirror data)
- Non-declared (estimates): n.d.

Gold exports

- Declared: 672 kg in 2023, mainly to South Africa, Switzerland and the United Arab Emirates
- Non-declared (estimate): most likely upward of 2 tonnes per year, mainly to the United Arab Emirates

EITI member: no

Reports to UN Comtrade: yes, but some of the reported weights of gold exports are not reliable.

SUMMARY

Kenya is both a sizeable gold producer according to African standards and a regional transit hub for flows of yellow metal headed for the United Arab Emirates (Dubai).

The bulk of domestic gold production comes from artisanal and small-scale mining (ASM) and is not recorded by Kenyan state authorities due to the highly informal nature of that subsector. A study published in 2022 estimated that **ASM in Kenya yields 6.9 tonnes of gold a year** on average. Official gold production figures (e.g. 358 kg in 2024) cover the output of only two licensed mines.

Part of the gold that is smuggled out of South Sudan, the Democratic Republic of Congo and, to a lesser extent, Ethiopia, and possibly Sudan passes through Kenya before being ultimately reexported. In other words, Kenya acts as a **transit hub for gold from neighbouring and nearby countries**.

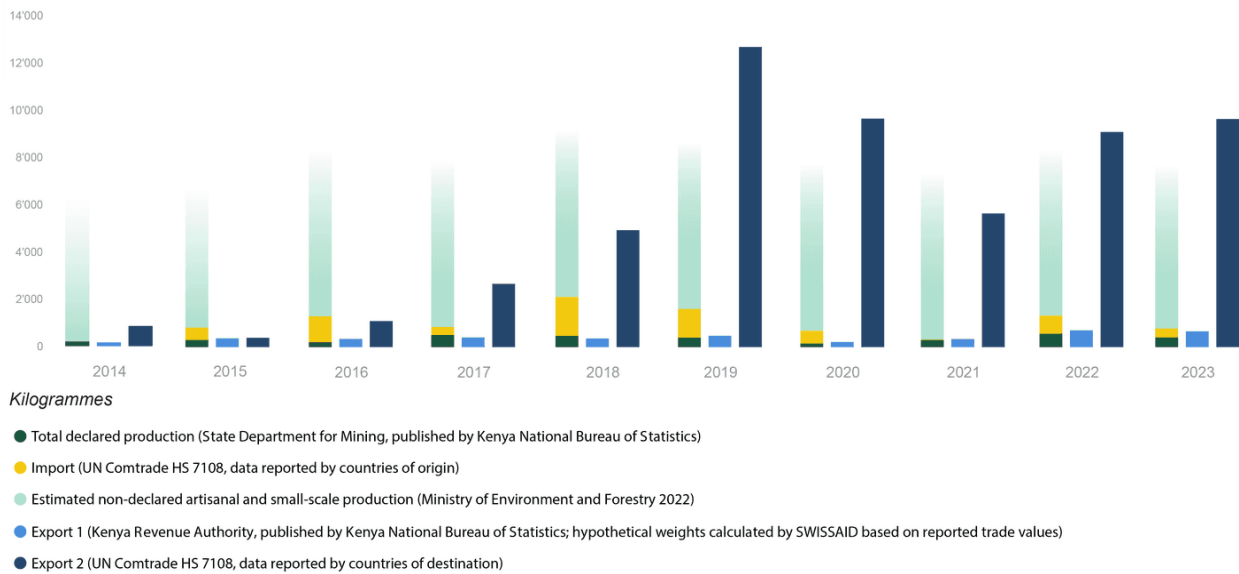
Most, if not all, the gold extracted in Kenya or imported into the country is exported. Undeclared production from Kenyan ASM is smuggled out of the country and reaches mainly the United Arab Emirates, possibly also

Uganda and Tanzania. The two licensed medium-scale mines responsible for Kenya's declared gold production ship their material to refiners located in South Africa and Switzerland.

Official figures for gold exports do not account for the scale of the phenomenon or its evolution. They have remained at the three-digit level (e.g. 672 kg in 2023) and not moved much in the last ten years (2014-2023). By contrast, their mirror image, namely imports of gold from Kenya reported by the authorities of the other countries, have shot up in the late 2010s and are consistently above the 8-tonnes limit since then (e.g. 9.65 tonnes in 2023). One would be hard pressed to calculate outbound illicit flows precisely, given that there are many unknowns in the equation, but there is **little doubt that they currently exceed 2 tonnes per year.**

OVERVIEW

Overview of the gold sector in Kenya



Between 2014 and 2023, more gold was either produced in Kenya or imported into Kenya than exported out of the country. This is apparent in the graph above: for each year represented, the left column is higher than the middle one. If Kenya was a major gold consumer, that might explain the gaps. But this is not the case. Quite to the contrary, reports on Kenya's gold sector highlight the country's role as an exporter and a regional transit hub for the yellow metal. Accordingly, the graph above reveals **outbound illicit gold flows of considerable significance over the last decade.**

This finding is corroborated by the comparison between reported gold exports from Kenya (middle columns) and their mirror image, namely imports of gold from Kenya reported by the authorities of the other countries (right columns), which shows that, for all years except 2015, exports are only a fraction of their mirror image. This is because most of the gold that is smuggled out of Kenya is shipped to Dubai and declared for import there. In other words, one can be confident about the existence of sizeable outbound illicit gold flows, because this gold resurfaces further down along the value chain and becomes visible

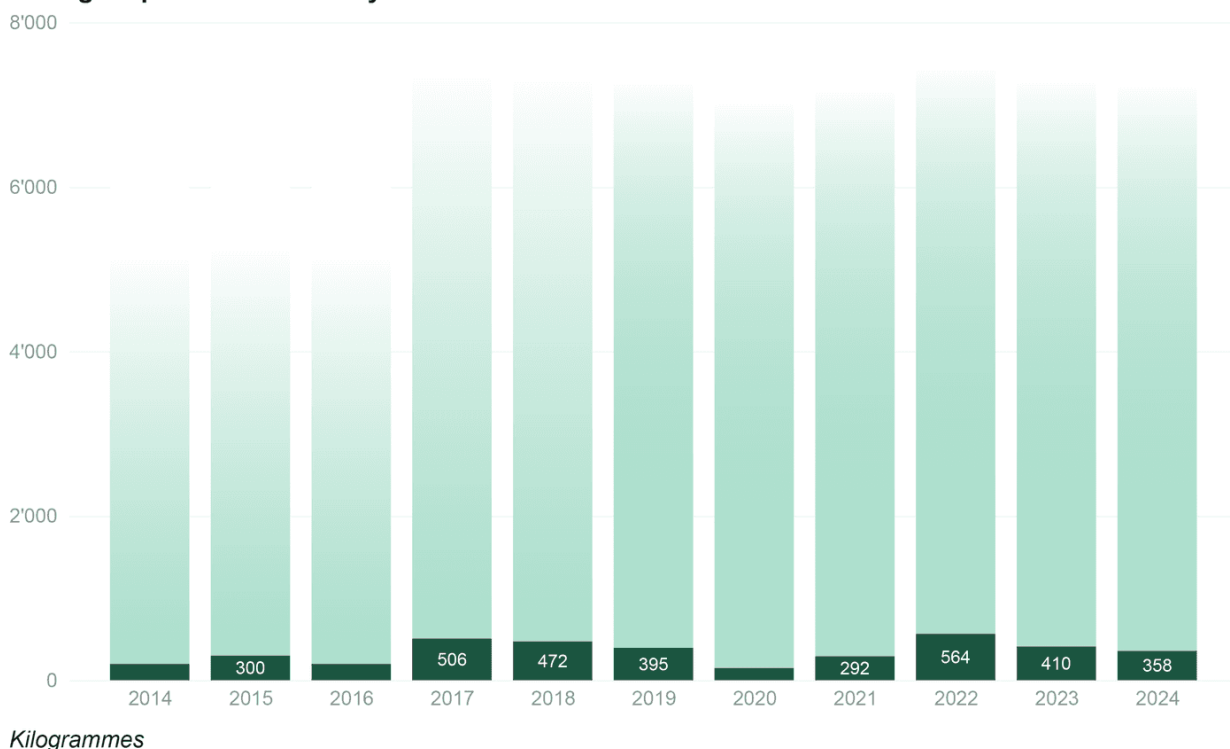
there through official statistics.

The fact that, for most years since 2019, declared imports of gold from Kenya into other countries (right columns) are higher than Kenya's gold production and declared imports (left columns) points to inbound illicit gold flows being an important reality as well. As explained below, Kenya serves as a transit hub for gold from neighbouring and near countries, particularly South Sudan and the Democratic Republic of Congo (DRC).

GOLD PRODUCTION

Official figures on gold production in Kenya can be found in the Economic Survey published yearly by the Kenya National Bureau of Statistics (KNBS). They are communicated to KNBS by Kenya's State Department for Mining (SDM), which collects them from a handful of companies. A Kenyan official consulted by SWISSAID pointed out that these figures are in fact based on exports reported by the companies¹.

Total gold production in Kenya



- Estimated non-declared artisanal and small-scale production (Ministry of Environment and Forestry 2022)
- Total declared production (State Department for Mining, published by Kenya National Bureau of Statistics)

SWISSAID contacted SDM to better understand how official figures on gold production in Kenya are structured. In particular, SWISSAID asked SDM for disaggregated data, which would have made it possible to know which type(s) of extraction (e.g. artisanal, small-scale, large-scale) are covered by available figures and which types are not. But SDM did not reply to SWISSAID’s request for information, so there is a lack of clarity on this.

That said, SWISSAID managed to contact several non-state experts on Kenya’s gold mining sector and asked them which types of extraction methods or sizes of operations are covered by official figures. The replies reveal a consensus among these experts that official figures on gold production in Kenya cover virtually no gold from artisanal and small-scale mining (ASM). As one expert put it: “Most of the ASM gold is never recorded in government books because it is either traded by unlicensed

dealers internally or smuggled to neighbouring countries through the porous borders. As such no data on gold from ASMs as of now”². Likewise, the Kenya Chamber of Mines explained that “regretfully, there is no accurate data that has been collected by either government or other stakeholders on the production of ASM. This is due to the informal nature of the production setup, lack of proper law implementation on the ground, and various other factors”³.

According to the experts consulted by SWISSAID, official figures on gold production in Kenya account mainly for the output of only two mines, Karebe and Kilimapesa, which are located in the Western part of the country. One of the experts referred to operations at these mines as “medium-scale”⁴, another as “small-scale industrial”⁵, yet another as “medium to large-scale”⁶. One expert stressed that although these operations are sometimes referred to as “industrial” in Kenya, they would most likely qualify as “small-scale” in another national or continental context⁷. All this suggests that Kenya’s largest gold mines do not belong clearly to one or the other of the categories mostly widely used to refer to mining, namely artisanal and small-scale mining (ASM) and industrial or large-scale mining (LSM) – and points to a flaw in this conceptual framework, which makes it inappropriate for describing certain local realities.

The **Karebe Gold Mine**, which operates in Chemasi, is run by Karebe Gold Mining Limited (KGML) and 80%-owned by Maris Group, according to that group’s website ([Maris Group n.d.](#)). At some point in the recent past, Maris Group described the mine as “the largest gold producer in Kenya” ([Maris Gold n.d.](#), see also [The Nation 2021](#)). Yet, in an exchange dating back to November 2021, Maris Chief Executive Charlie Tryon told SWISSAID that “the mine has produced circa 1 tonne of gold during this period [i.e. between 2010 and 2020]”, adding that “we are **small-scale** and produce circa 300 kg a year”⁸ (emphasis added).

The **Kilimapesa Gold Mine** is located in South-West Kenya, close to the border with Tanzania, and is run by Kilimapesa Gold (Pty) Ltd, a company fully owned by Caracal Gold, according to that group's website ([Caracal Gold n.d.](#)). In a document for investors, Caracal Gold wrote that it was expecting Kilimapesa to produce almost 750 kg (24,000 ounces) of gold per year by the end of 2023 ([Caracol Gold 2023](#)). That makes it one of only two “larger scale companies in operation” in Kenya, according to an expert consulted by SWISSAID (the other company being Shanta Gold's Western Kenya Project, see below)⁹.

A table below indicates which refineries Karebe and Kilimapesa have been sending their gold to in recent years.

The one mine in Kenya that best qualifies as “large-scale” is certainly Shanta Gold's **Western Kenya** Project. However, at the time of writing, gold production at that mine had not started yet: news about the project suggested that it was nearing the end of the exploration phase ([Mining Review Africa 2024](#), [Nation.Africa 2024](#), see also [Shanta Gold n.d.](#))¹⁰; the SDM's mining cadastre portal indicated that Shanta Gold only had “prospecting licenses” ([SDM n.d.](#), consulted in March 2025); and one of the experts consulted by SWISSAID wrote that the project “ha[d] not started yet”¹¹.

Likewise, one of the experts consulted by SWISSAID mentioned Red Rock Resources, which owns the **Mikei Gold Project** (previously referred to as Migori Gold Project), as a “large-scale mining company” operating in Kenya. However, there is little publicly available information on this company and its project. SWISSAID could find neither the name of the company on the SDM cadastre portal ([SDM n.d.](#), consulted in March 2025) nor any recent account of the status of its project in Kenya. An “update” released by Red Rock Resources in 2022 indicates that the project had not yet entered the production phase at

that time (FT Market Data 2022).

According to one of the experts consulted by SWISSAID, official figures on gold production in Kenya could cover the output of “Chinese-affiliated companies that operate at medium- to large-scale levels”, even though these companies “do not comply fully with due diligence mining guidelines and laws”, according to the expert¹².

UNDECLARED ASM GOLD PRODUCTION

As stated above, most of the gold extracted through ASM in Kenya is not declared at the production stage. There is therefore no choice but to rely on estimates to get an idea of the scale of that subsector’s output.

One such estimate can be found in the National Action Plan for Artisanal and Small-Scale Gold Mining in Kenya (NAP), which was published in 2022 by the Ministry of Environment and Forestry (MEF). Based on a baseline study conducted in 2019, which covered six counties (Kakamega, Migori, Siaya, Nandi, Narok and Vihiga) and looked at mercury consumption, the authors of the NAP estimate that gold production through ASM in Kenya reaches 6.9 tonnes a year on average (MEF 2022: 2). The authors of the NAP explain that “the bulk of gold production in Kenya is usually done by small-scale and artisanal miners in Western Kenya, [...]. However, since the gold is traded informally this is never reported in government statistics [...]” (MEF 2022: 24). The NAP acknowledges that gold ASM is not restricted to the counties covered in its baseline study but present in others as well, so the actual gold production from this subsector at the national level could be even higher than estimated 6.9 tonnes.

SWISSAID chose to display the estimate found in the NAP in its data visualisations, because it is relatively recent, based on fieldwork (mine site visits) and deemed realistic by at least one expert of ASM in Kenya¹³.

SWISSAID found another estimate, namely 5 tonnes a year, in several publications (e.g. [Pact and ARM 2018: 4](#)), but deems it less reliable, because it originates from a study published more than ten years ago ([Seccatore 2014](#)) that used a very basic method for calculation. Likewise, the estimate of almost 4 tonnes a year found in a report by the Global Initiative against Transnational Organized Crime (GI-TOC) is speculative and therefore not particularly reliable. GI-TOC writes: “Officially only 394.9 kilograms of gold were produced in 2019. According to a source in the Ministry of Petroleum and Mining, ASGM [i.e. artisanal and small-scale gold mining] could be producing ten times the official figures, but most of this remains in the informal value chain” ([GI-TOC 2021: 10](#)).

These estimates refer to total ASM gold production, so, in theory, they cover not only undeclared but also declared production. However, since very little, if any ASM gold is declared to or registered by state authorities in Kenya, they can be considered to account exclusively or almost exclusively for undeclared production of the yellow metal.

According to an expert on ASM in Kenya consulted by SWISSAID, around half a million people are currently working in Kenya’s artisanal and small-scale gold mines, and the sector employs another two million people indirectly. This “rough guess” is higher than the estimate found in the NAP, namely approximately 40,000 miners and 800,000 dependents on the sector ([MEF 2022: 2](#)), and also higher than that found on the Delve Platform ([Delve n.d.](#)), namely 140’000 people directly employed. The expert justifies this by claiming that “a lot of data has not been covered and new areas which emerged recently are now the biggest mining corridors”¹⁴.

The same expert told SWISSAID that “the biggest mining corridors are in Migori, Narok, Homa Bay, Siaya, Kakamega and Vihiga Counties around Lake Victoria goldfields and Migori greenstone belt”. Most gold extracted through ASM in Kenya comes from these regions. However, there are

also “other areas with significant gold production” in Northern Kenya, including West Pokot (mainly alluvial mining), Turkana and Marsabit and Isiolo. “But these areas are prone to conflicts”, due to ethnic and inter-clan clashes, cattle rustling, banditry, illegal arm ownership and the presence of jihadists from the Somalian Al Shabaab group, “making it a conflict high-risk zone”¹⁵.

For the expert, gold production from ASM in Kenya has clearly increased in recent years, to the point where it is not exaggerated to speak of a gold rush. Among the explanatory factors, he sees: rising gold prices, youth unemployment, corruption, climate change, and the lack of protectionist measures to support the price of sugarcane, sweet potato and maize, which fell in reaction to the arrival of cheap imports from neighbouring countries, triggering the collapse of what used to be the backbone of the economy and the main source of livelihood for people living in rural areas in Western Kenya¹⁶.

FORMALISATION OF ASGM IN KENYA

There have been talks about remedying the informality of artisanal and small-scale gold mining (ASGM) in Kenya. The NAP mentions measures that “will include formalization of the sector by fast tracking registration of mining groups, mapping of ASGM sites and registering miners, regulation of market in gold trade to ensure miners get the best prices for their products through establishment of commodities exchange as well as operationalizing County Mining Committees. Incentives for formalization will include technical and financial assistance to the registered groups” (MEF 2022: 6). Certainly, as part of this endeavour to formalise ASGM, the Kenyan government supported the opening of a gold refinery in Kakamega, in the heart of Kenya’s main gold producing region, by a Chinese company named H-Nuo Kenya Company Ltd. The refinery is due to become operational in 2025 (Africa Intelligence 2024, KBC 2024).

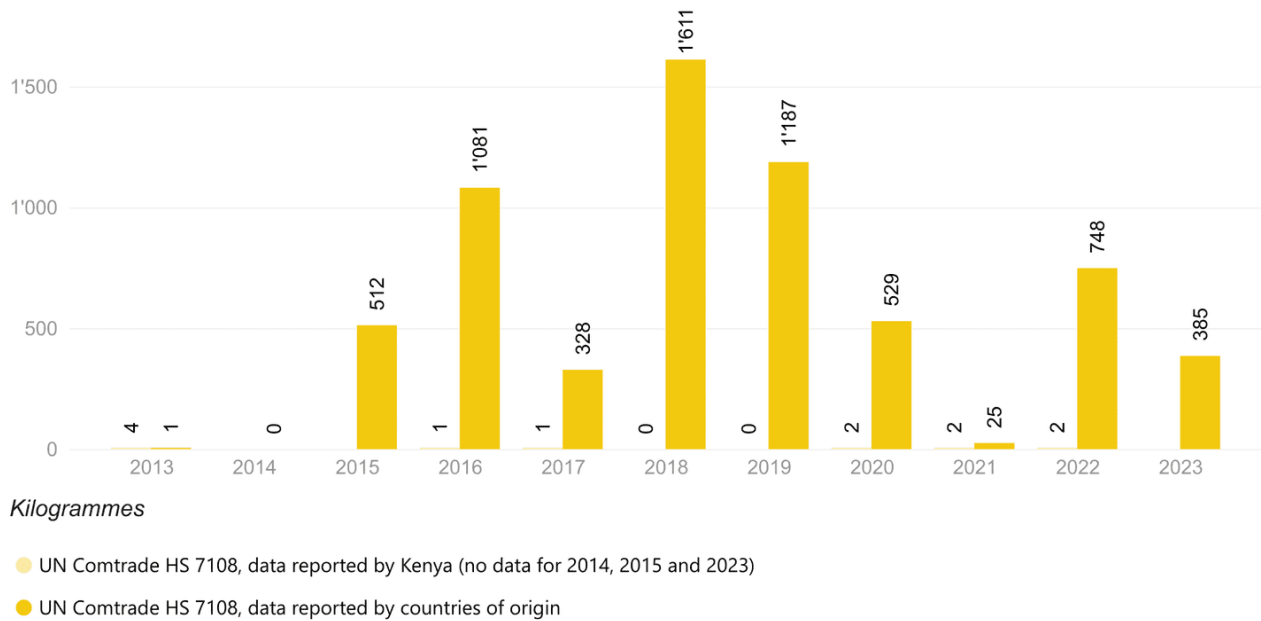
A key question in this regard is whether these measures have been implemented and, if so, whether they have been effective. SWISSAID's rapid analysis suggest that this is not the case. According to French geographer Joseph Bohbot, who conducted research in Kenya in 2023, regulatory reforms aimed at transforming ASGM in that country have been hampered by institutional weaknesses. He notes that, among other things, the Ministry of Petroleum and Mining [later renamed Ministry of Mining, Blue Economy and Maritime Affairs] lacks resources and that the United Nations Development Programme (UNDP) has not been able to implement its PlanetGold programme due to "ethnic and political games" affecting the Kenyan state. At the same time, Bohbot stresses that artisanal miners have found ways to self-regulate their activity and limit accidents (Bohbot 2024), and that describing them as "informal" misses the point, for their relationship with the state and its rules is multifarious. For instance, despite being unlicensed (at the central level), artisanal miners are officially being taxed locally (at the county level) on pits, crushers and buying counters¹⁷.

Another expert consulted by SWISSAID stressed that government attempts at organizing miners into cooperatives and creating a special police unit to crackdown on illegal mining operations are "at infant stages" and "not bearing any fruit" yet. According to him, "no artisanal mining group has been given any permit" so far. Yet, he also conceded that certain measures had had "some little positive impact on mining communities", for instance by "significantly reducing corruption", making land disputes less frequent, and putting an end to burglaries committed by members of criminal networks masquerading as miners and gun attacks, "which were rampant previously in ASGM areas". The same expert also noted that keeping a record of ASM gold production is currently being "encouraged and supported through capacity building by civil society organizations"¹⁸.

In August 2023, a new bill regulating gold collection and processing was introduced into Kenya's National Assembly with the aim of formalising small-scale mining, reducing the illegal gold trade and boosting state revenue ([National Assembly 2023](#), [Kahawa Tungu 2025](#)). Most importantly, the Gold Processing Bill proposes the creation of the Gold Processing Corporation, which can act as a gold refinery, regulate gold refining, and monitor other gold refineries ([The Kenya Times 2025](#)). At the time of writing (March 2025), the bill had not yet been enacted, so its impact on the sector remained a matter for conjecture. The entrusting of gold processing to a state-controlled entity follows a trend that can be observed throughout Africa in recent years.

Gold imports

Imports of gold into Kenya



According to what Kenyan authorities reported to UN Comtrade, the United Nations’ database on international trade, virtually no gold was imported into Kenya over the period 2013-2023. This contrasts with what the authorities of the other countries reported. The relatively high figures that the mirror image of Kenya’s gold imports reveals are due to net weights reported by the Emirati authorities. According to these authorities, significant quantities of gold left the United Arab Emirates (UAE) with Kenya as destination during the last decade. In UN Comtrade, these exports from the UAE to Kenya are reported under customs code HS 710812, which means they consist officially in “non-monetary” gold. SWISSAID did not investigate this aspect further.

Illegal gold imports

What official figures do not show is that **significant quantities of gold are being smuggled every year into Kenya from neighbouring and nearby countries**, more particularly South Sudan, the Democratic Republic of Congo (in some cases through Tanzania), Ethiopia and possibly Sudan. This gold does not remain in Kenya; it is **re-exported to**

destinations such as the UAE and India (see below, section on exports).

Gold smuggling from **South Sudan** to Kenya has been largely documented in recent years. In a report published in 2021, the Global Initiative against Transnational Organized Crime (GI-TOC) writes: “Most of the gold produced in South Sudan is smuggled out of the country. The main supply chains run from South Sudan across into Uganda and **Kenya** and it also moves to the DRC and Sudan. [...] The direction which gold moves is largely determined by the proximity of the closest border. The main border posts used for this purpose are Nimule-Elegu and Kaya (Uganda) and **Nakodok (Kenya)**” (GI-TOC 2021: 30, emphasis added). GI-TOC also describes the mechanism: “In South Sudan, local buyers (often people from the area) buy gold from miners and sell it to larger buyers in regional towns, such as Kapoeta or Yei. From there, dealers take the gold to Juba (either by air or by car, depending on the security situation) or over the border to Uganda or **Kenya**” (GI-TOC 2021: 30, emphasis added). Somali traders seem to play a leading role in this traffic: “Kapoeta: Artisanally mined gold is mostly sold to Somali traders, but also Kenyan and South Sudanese businessmen. From Kapoeta, gold is smuggled into Kenya through the Nadapal-Lokichogio border post. Some traders will sell gold at the Lokichogio border with Kenya, while others will transport the gold all the way to Nairobi. Eastleigh, a predominantly Somali neighbourhood in Nairobi known to be a gold hub, was specifically referenced by interviewees” (GI-TOC 2021: 30, emphasis added). At the same time, GI-TOC stresses that independent traders and small businessmen are “small players in South Sudan’s illicit gold trade compared to the amounts of gold produced and traded by criminal networks linked to political elites and foreign nationals” (GI-TOC 2021: 30).

In 2023, GI-TOC looked deeper into illicit cross-border flows of gold from South Sudan to Kenya. Its researchers identified the main routes taken

by smugglers and the main factors underlying this traffic, namely minimal and largely ineffective border controls (on both sides), patronage by local high officials (at least in South Sudan) and a lack of cooperation between South Sudanese and Kenyan state authorities (GI-TOC 2023: 18). The authors of a report published by The Enough Project in 2020 also highlight “active complicity of local and national governments” as a key factor behind illicit gold flows from South Sudan to Kenya (The Enough Project 2020: 1).

The other main country of origin of illicit gold flows into Kenya is the **Democratic Republic of Congo** (DRC). As GI-TOC acknowledges, “the bulk of illicit Congolese gold is smuggled out via Burundi, Rwanda and Uganda”. However, “**Kenya also plays a major role** in the regional illicit gold trade, and **Kenyan nationals** have routinely been named in UN sanctions reports” (GI-TOC 2023: 3, emphasis added, see also Impact 2021). GI-TOC managed to interview a Kenyan gold smuggler in 2023, who claimed that (as GI-TOC summarises) “about 100 to 200 kilogrammes of illicit gold from the DRC leaks into the Kenyan secondary market every month”. According to the smuggler, “that’s what everyone needs to compete for”. GI-TOC observes that that the smuggler’s estimate “comes remarkably close to accounting for the discrepancy between the official export and import figures” (GI-TOC 2023: 5) and explains: “The upper end of this estimate – 200 kilogrammes per month – would equate to 2.4 tonnes of Congolese gold illicitly exported through Kenya annually. The value of that gold – about US\$140 million – would account for most of the US\$185 million discrepancy between official Kenyan exports and UAE imports of gold in 2021, as reported to UN Comtrade” (GI-TOC 2023: 26, footnote 12). In other words, GI-TOC advances that most of the trade gap in gold between Kenya and the UAE gold could be due to Kenya’s role as a transit country for illicit gold flows from the DRC.

Although it is difficult to assess the validity of this suggestion, which is

based on a single person's account, it is interesting to note that it tallies with what SWISSAID has heard from other actors in Kenya's gold sector. In particular, the CEO of Maris, the group owning the Karebe gold mine, explained to SWISSAID that "much of the gold coming from Kenya is of DRC origin"¹⁹.

An expert on ASM in Kenya consulted by SWISSAID in early 2025 confirmed that gold was "smuggled from Congo and South Sudan [...] through Kenya to Dubai and Abu Dhabi in UAE via Kenyan airport (JKIA)" and added that "this business is mostly dominated by Indians and Somalis (of Kenyan origin) and their wholesale shops are in Eastleigh [...] in Nairobi"²⁰.

A report, published in 2019 by the Canadian NGO Impact, mentions illicit gold flows leaving the Eastern DRC, entering Tanzania (in part through Uganda) and then being reexported from Kenya mainly to the UAE and India ([Impact 2019: 27](#)).

There are good reasons to believe that gold is also smuggled into Kenya from Ethiopia. An Ethiopian journalist writing about the gold rush experienced by parts of his country specifies that "the gold from Oromia and Southern Ethiopia is smuggled out of the country via **Kenya's** and Somalia's borders" ([The Reporter Ethiopia 2023](#), emphasis added). According to another Ethiopian observer, traffickers use the "the Moyale and Yabelo route to Kenya" ([Ethiopian Business Review n.d.](#)). GI-TOC notes that "already a key corridor for a wide range of illicit trade, the Kenya-Ethiopia border has increased in importance during the pandemic" and advances that "it is possible that gold could also be moving this way" ([GI-TOC 2021: 25](#)).

Kenya may also have become a transit hub for gold from **Sudan**, a country where civil war has been raging since April 2023. As of May 2025, tens of thousands of Sudanese have died because of that war,

millions have been displaced, sexual violence against women has become commonplace and half of the Sudanese population relies on food aid (see, e.g. [BBC 2025](#)). Both warring parties, i.e. the Rapid Support Forces (RSF) and the Sudanese Armed Forces (SAR), use gold to finance their war effort (see country profile [Sudan](#)). In Kenya, officials have recently been accused of having ties with Sudanese militias and of contributing to the war in Sudan through the gold trade ([The Standard 2025](#)). This follows a meeting between the Kenyan government and RSF leader Mohamed Hamdan “Hemedti” Dagalo in Nairobi in February 2025, which led the international community, particularly the U.S. State Department and the UN Security Council, to criticise the Kenyan government for taking sides in the conflict in Sudan ([VoA 2025](#)). SWISSAID considers it plausible that gold may be flowing from Sudan to Kenya, given Kenya’s role as a transit hub. However, SWISSAID’s brief research on this aspect has not yielded any solid evidence so far.

It is difficult to assess the scale of gold smuggling into Kenya and its evolution in recent years, for few of the sources mentioned above put a figure on the amounts of yellow metal being moved across the border into Kenya. This said, one event suggests that the traffic is everything but small: a cargo of three tonnes of gold from the DRC on its way to Dubai through Kenya is said to have gone missing from the customs at Nairobi’s international airport in November 2023 ([KTN 2024](#)).

In all likelihood, the phenomenon of gold smuggling into Kenya is related to the large number of gold refineries operating in that country, in particular in Nairobi and its surroundings (see [GI-TOC 2023: 3](#)). A basic web query reveals the names of several of them (e.g. Afrik Gold Testers, Canacongo Global, Emirates Refinery Ltd Lavington, Grana Gold, Gulf Refinery), some of which are evocative of links with the UAE. These refineries might even act as a key driver of illicit gold flows into Kenya. If the National Assembly passes the Gold Processing Bill (see above), a Gold Processing Corporation will be created to oversee the activities of

Kenya's numerous refineries. Whether or not this will effectively reduce the illegal gold trade remains to be seen.

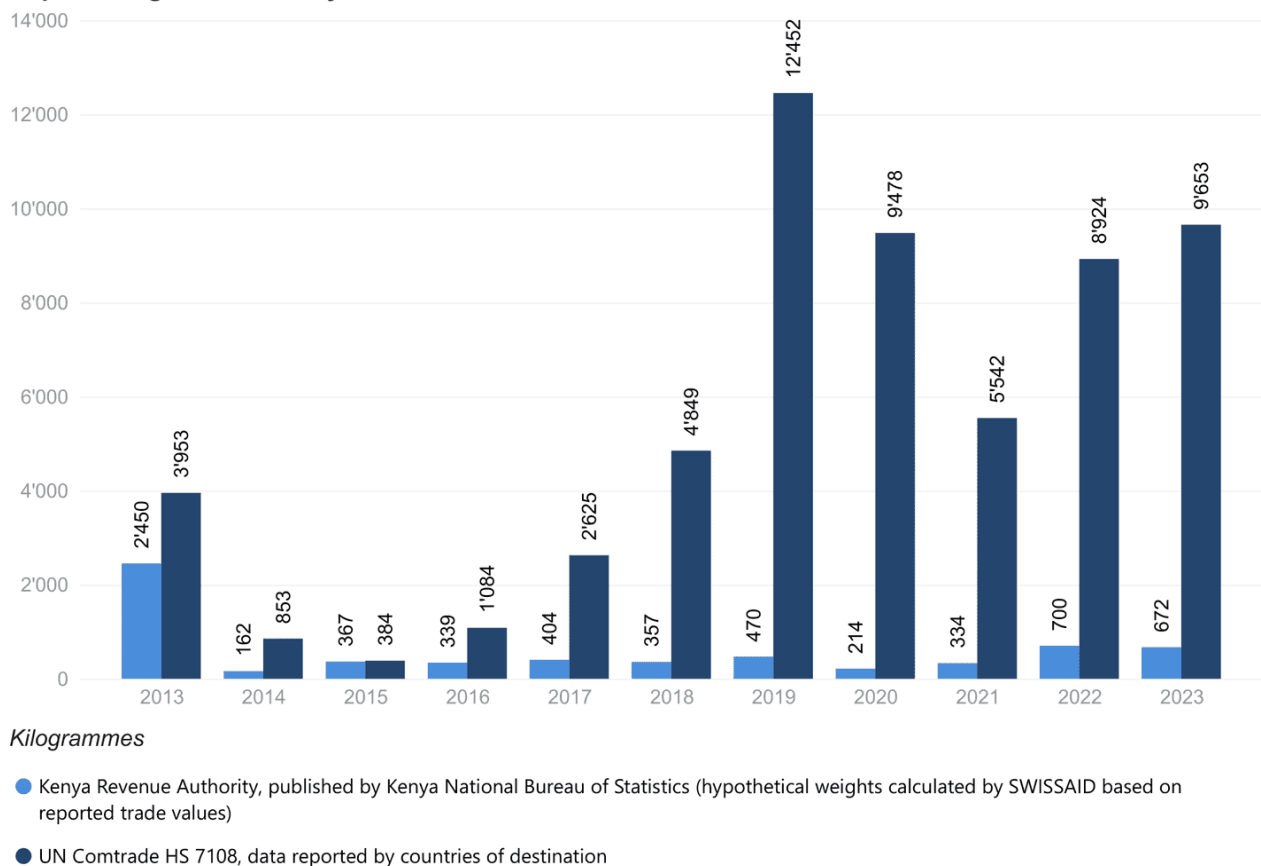
In parallel to the traffic in actual physical gold, a sizeable fraudulent industry has developed in Kenya in which conmen pretend to be in possession of gold (most often from the DRC) and attempt to swindle buyers out of their money (GI-TOC 2023: 5-12). Several of these scams turned into public scandals and some even triggered diplomatic incidents (see, e.g. IPIS 2021 on the late 2000s and early 2010s or The Africa Report 2019 on the 2010s). In Kenya, fraudulent business schemes based on purported imports of gold from the DRC have a famous precedent, known as the Goldenberg Scandal, which dates back to the 1990s (for a summary, see Grynberg and Singogo 2023). GI-TOC stresses that “our source [i.e. the Kenyan gold smuggler] repeatedly emphasized that as much profit accrues from scams as from the smuggling of authentic gold” (GI-TOC 2023: 5).

GOLD EXPORTS

Although a market for gold no doubt exists within Kenya, figures on domestic consumption of the yellow metal are lacking. Given the presence of both gold mines and precious metals refineries in Kenya, one can assume that a substantial part of domestic demand for the yellow metal is met with material that originates from the country's own mines. Some of the gold that is smuggled into Kenya may also satisfy domestic demand for gold – that said, available reports suggest that the bulk of this illicit gold is destined for reexport rather than for local consumption. Local demand may not be particularly strong anyway. Some evidence suggests that jewellery sold in Kenya, in particular, is mainly imported into the country rather than fabricated there (Smith et al. 2023: 17), which implies a relatively low demand for gold bullion from that sector. If this were to be the case for the investment sector as well, one could assume that all gold mined in Kenya is exported out of the

country. Be it as it may, the lack of publicly available figures on Kenya's domestic gold market makes it impossible to take this aspect into account in analysing the country's gold sector.

Exports of gold from Kenya



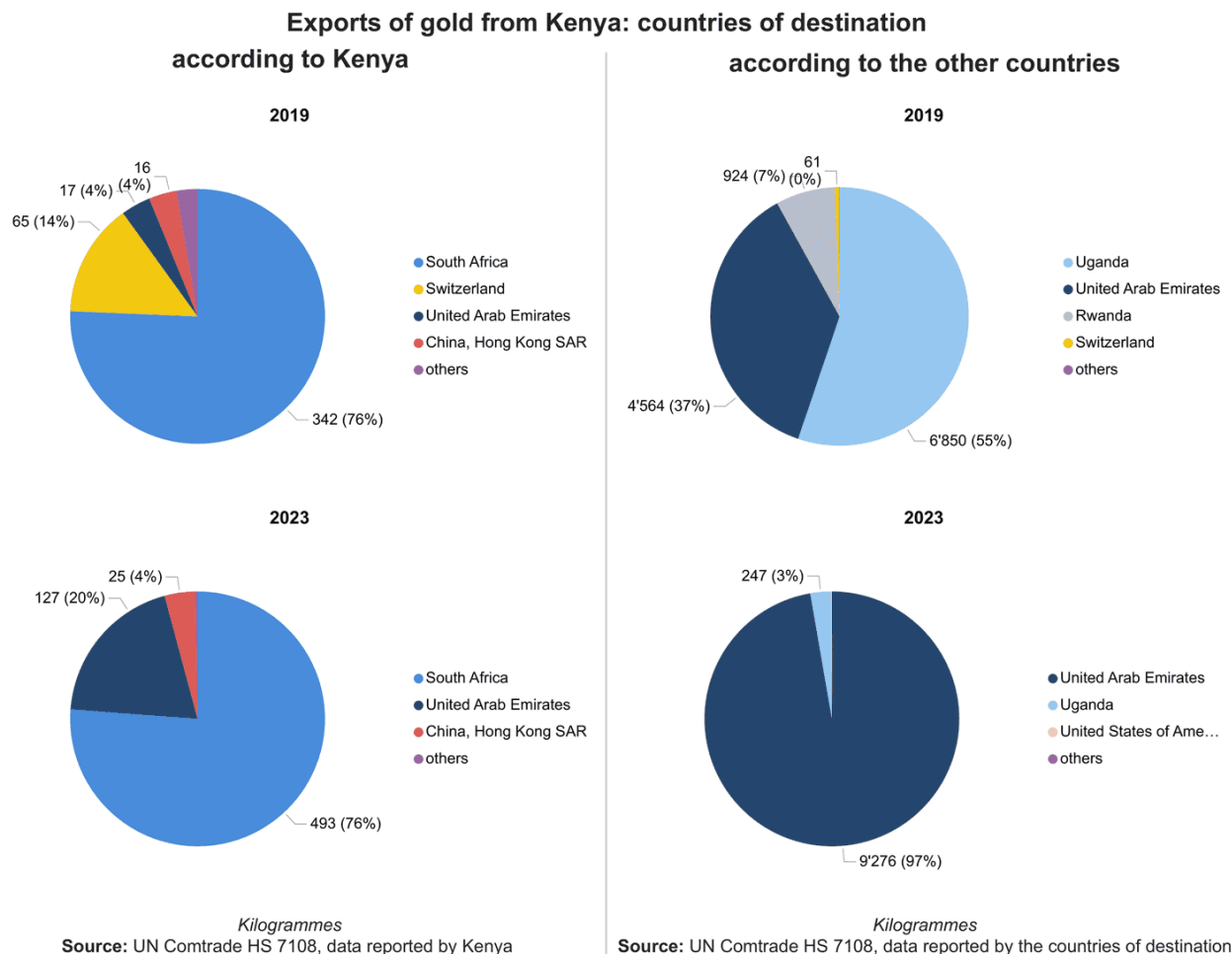
Data on gold exports from Kenya is collected by the Kenya Revenue Authority (KRA) and communicated to the Kenya National Bureau of Statistics (KNBS) for publication in the latter's Statistical Abstract (**KBNS n.d.**). The reported total commercial values of these exports over the period 2014-2023 seem realistic; they fluctuate, but within a plausible range. On the other hand, the reported total weights vary so much that they can hardly be used for the analysis²¹. SWISSAID reached out to these Kenyan authorities, asking for an explanation or corrected figures, but received none from KNBS and no reply from KRA. SWISSAID therefore decided to calculate hypothetical weights based on reported values, using the average annual closing price of gold and assuming a purity of 80% – arguably a conservative percentage. Interestingly, this method led to figures that are similar, though not equal to those on gold production reported by Kenya's State Department for Mining (SDM) or

communicated to SWISSAID by the Kenya Chamber of Mines (KCM)²².

Kenyan authorities also report data on gold exports to UN Comtrade, but total weights in that database are either missing²³ or manifestly erroneous²⁴ or do not tally with total commercial values²⁵, so SWISSAID decided to ignore them.

As the graph above shows, the comparison between gold exports from Kenya and their mirror image reveals large gaps for almost all years. The total gap over the period of ten years between 2014 and 2023 amounts to **51.8 tonnes**. This is the quantity of gold that was declared as originating from Kenya upon import in other countries, but that was not declared upon export from Kenya. Unless it can be explained by other factors, this gap raises a **suspicion about huge illicit gold flows out of Kenya**.

COUNTRIES OF DESTINATION



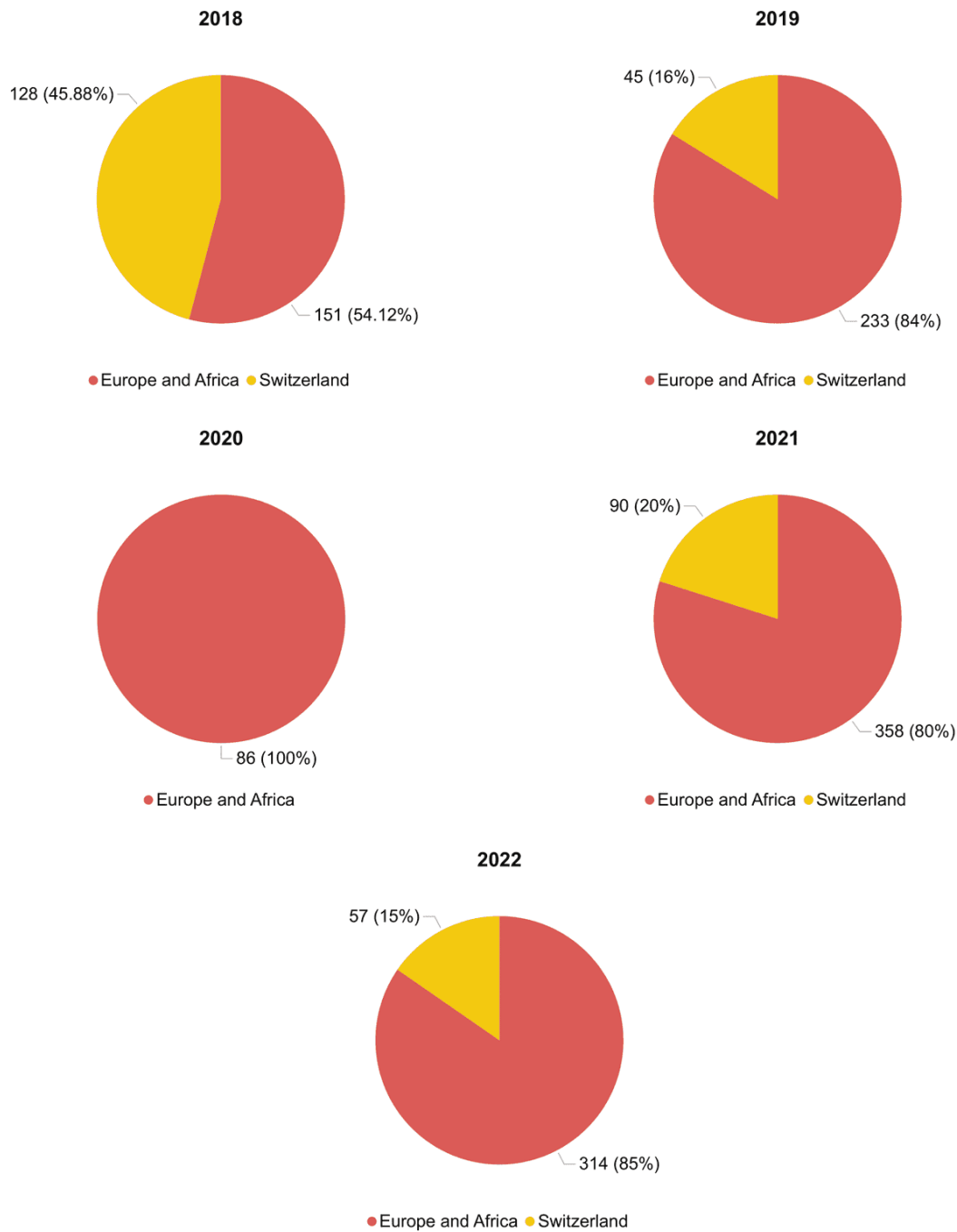
Given the unreliability of the figures on total weights of gold exports from Kenya found in UN Comtrade, SWISSAID was reluctant to use that database in its analysis of the destination of those exports. SWISSAID therefore asked KNBS to share data on gold exports disaggregated by country of destination. KNBS obliged²⁶; but the figures it sent contained obvious inconsistencies and possible errors. SWISSAID highlighted them and asked several follow-up questions²⁷; which KNBS claims to have forwarded to the “customs authority of Kenya in charge of declaration”²⁸. A month and half later, KNBS wrote that it still hadn’t heard back from that authority²⁹:—which may be the Customs & Border Control Department (CBCD), a department within KRA. Two months later, SWISSAID wrote again to KNBS, but received no reply. More than a year later, SWISSAID addressed the head of CBCD with a formal request for

information, asking again for gold exports data disaggregated by country of destination, but received no reply. Attempts at obtaining this type of data from PlanetGold's Kenya programme proved entirely vain too. SWISSAID therefore had no choice but to work with UN Comtrade data on this aspect of its analysis.

The first observation that can be made based on the pie charts above is that, according to Kenyan authorities, South Africa is the main destination for gold shipped out of Kenya. Yet South Africa does not even appear among the countries whose authorities have reported gold imports from Kenya in 2019 and 2023. This is because South African authorities apply the strict special trade system instead of the general one, leading to official statistics that do not reflect reality (see country profile [South Africa](#)). SWISSAID asked the South African authorities to provide more accurate data on gold imports into South African, including from Kenya, but did not receive it.

The second observation that can be made is that the authorities of the UAE, Uganda and Rwanda reported considerable imports of gold from Kenya into their respective countries. This true not only for the years 2019 and 2023 but for other recent years as well. Yet, according to what Kenyan authorities reported to UN Comtrade, there were no exports of gold to Uganda, virtually none either to Rwanda and only relatively small quantities to the UAE. This is a **strong indication that gold is smuggled out of Kenya and to these countries – or rather to the UAE, since the main destination for gold exports from Uganda and Rwanda is the UAE.**

LBMA refineries: imports of gold from Kenya



Kilogrammes

Source: LBMA Country of Origin Data

These graphs only show data on imports of gold from large-scale (industrial) mines.

According to Country of Origin Data published by the London Bullion Market Association (LBMA), which describes itself as “the world authority for precious metals”³⁰, LBMA-certified refineries located in the regions “Switzerland” and “Europe and Africa” imported gold from large-scale or industrial mining in Kenya in recent years.

In a research published in 2023, SWISSAID shed light on business relationships between African industrial gold mines and the refineries they ship their gold to (SWISSAID 2023). About Kenya, SWISSAID found the following relationships.

Mine	Mining company	Refinery	Country of the refinery
Karebe	Maris (KGML)	Rand Refinery (at least until 2020)	South Africa
Kilimapesa	Caracal Gold	Rand Refinery (at least until 2020)	South Africa
		Argor-Heraeus (at least until 2023)	Switzerland

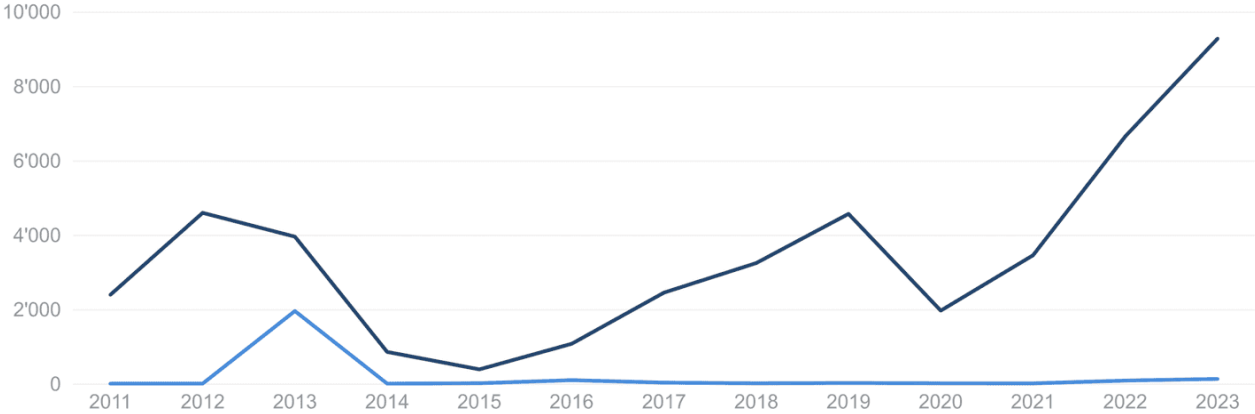
Source: *Out of the shadows: Business relationships between industrial gold mines in Africa and refineries* (SWISSAID 2023). The report contains references for each of the business relationships listed above.

These business relationships suggest that “Europe and Africa”, in the case of Kenya, means exclusively South Africa (Rand Refinery) and that “Switzerland” boils down to one refinery, namely Argor-Heraeus.

	Refineries in Switzerland			Refineries in "Europe and Africa"			Refineries in Germany		
	LSM	ASM	recycled or similar	LSM	ASM	recycled or similar	LSM	ASM	recycled or similar
2018	128	37		151		16			
2019	45			233		15			
2020				86		9			
2021	90			358		5			5
2022	57			314		5			

LBMA Country of Origin Data indicates that LBMA refineries imported not only LSM gold from Kenya but also ASM gold and gold that had been reprocessed in one way or another, but only in small quantities, as the table above shows.

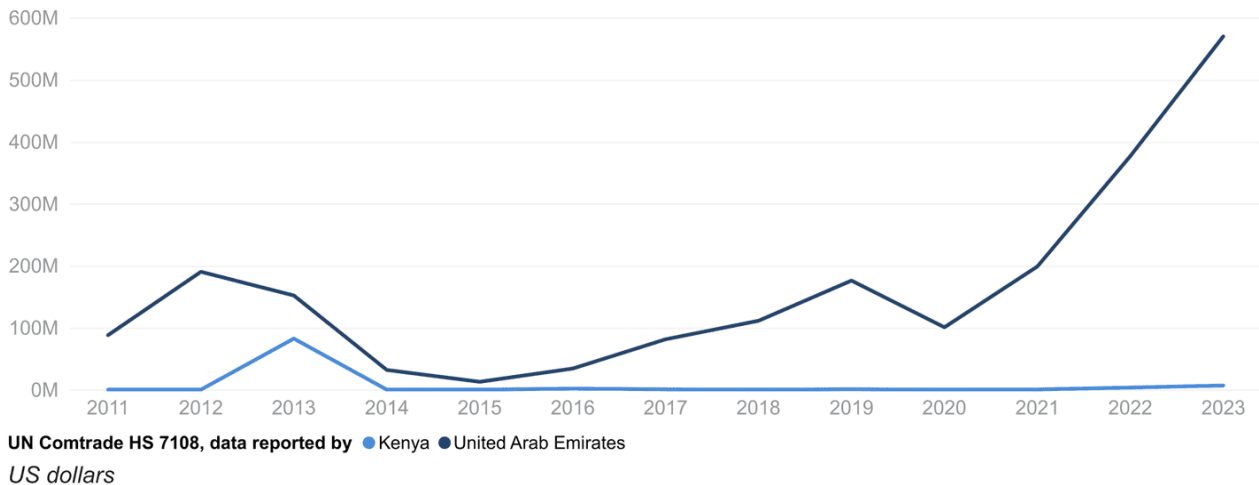
Exports of gold from Kenya to the United Arab Emirates versus mirror data: weight



UN Comtrade HS 7108, data reported by Kenya United Arab Emirates

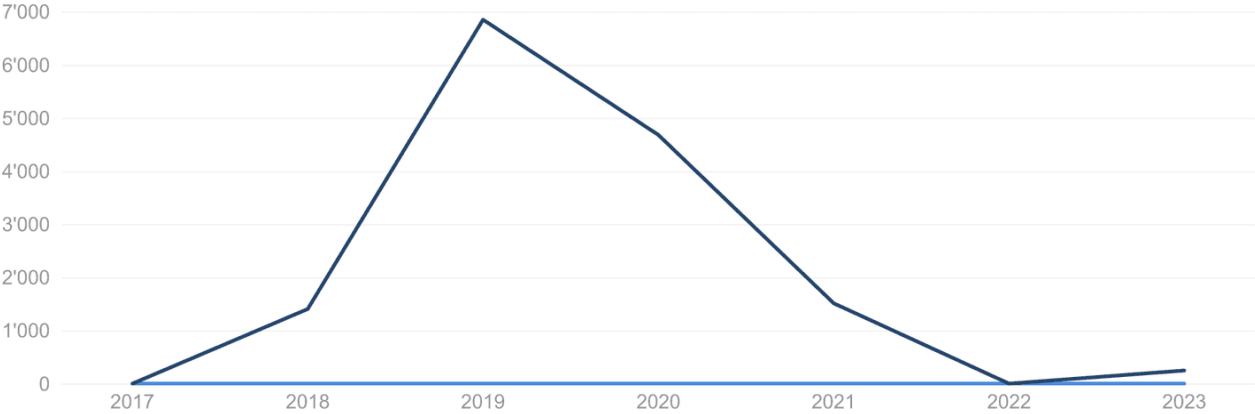
Kilogrammes

Exports of gold from Kenya to the United Arab Emirates versus mirror data: value



As can be seen on the graphs above, **the country with which Kenya has the largest gold trade gap is clearly the UAE**. Exports reported by the Kenyan authorities to UN Comtrade are very low for all years between 2011 and 2023, except 2013. By contrast, their mirror image, i.e. imports of gold from Kenya reported by the Emirati authorities, are high to very high. This is true of both reported weights and reported commercial values. **Over a ten-year period (2014-2023), the gap amounts to 33.5 tonnes or USD 1.68 billion**. As SWISSAID explained in its report *On the Trail of African Gold* (which is part of the same study as the present analysis on Kenya), there are good reasons to believe that the vast majority of customs declarations made in the UAE are true (SWISSAID 2024: 41). Therefore – and in the absence of any other explanatory factor – one can conclude that **the large quantities of gold that reach Dubai from Kenya are being smuggled out of that country**.

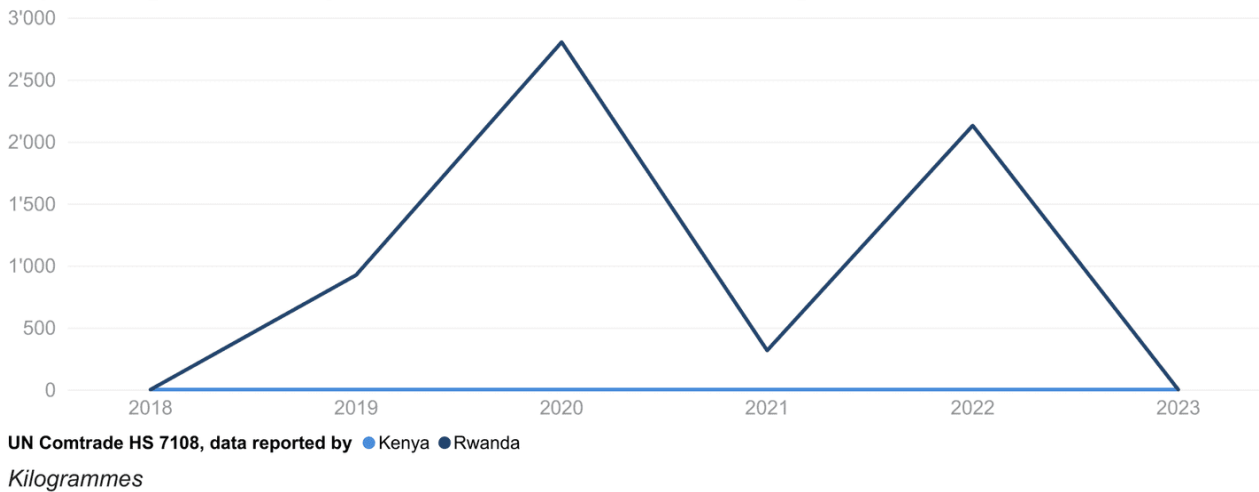
Exports of gold from Kenya to Uganda versus mirror data: weight



UN Comtrade HS 7108, data reported by Kenya Uganda

Kilogrammes

Exports of gold from Kenya to Rwanda versus mirror data: weight



As mentioned above, significant quantities of gold from Kenya have been imported into Uganda and Rwanda in recent years, according to the authorities of the latter countries. In the case of **Uganda**, SWISSAID accessed detailed customs data through a fee-based database, analysed it, and concluded that declarations on the country of origin of gold imports into Uganda are not particularly reliable; some of them do not seem plausible and are accompanied by evidence that suggests that the true origin of the gold could be the DRC, which raises suspicions of false declarations on that aspect (see country profiles **Uganda** and **DRC**).

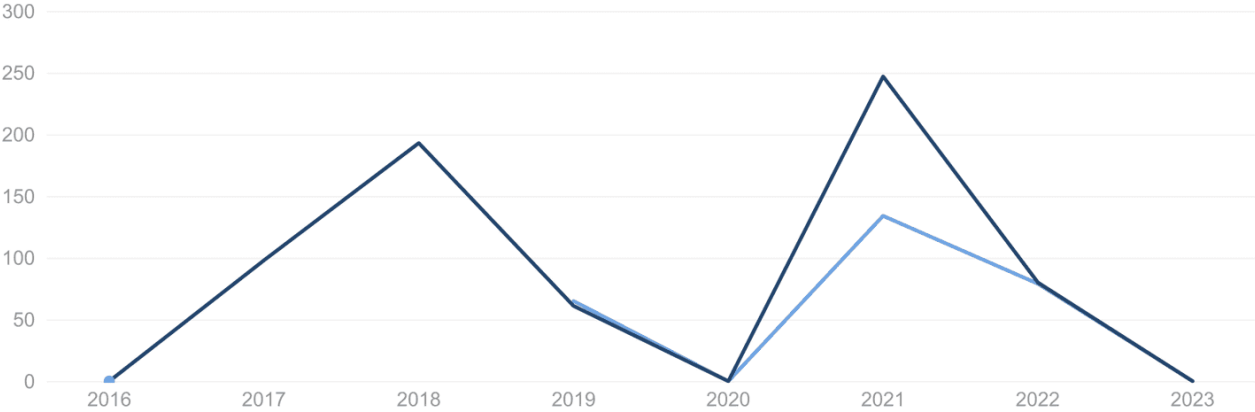
That said, Ugandan customs data for the period 1st January 2018 - 31 August 2021 shows that the vast majority of declarations of gold imports from Kenya indicate Kenya as being not only the country of origin but also the country of trading, and are linked with the names of shippers holding Kenyan citizenship. This suggests that the gold may effectively have come from there. In total, the Ugandan customs recorded 34.9 tonnes of gold imports from Kenya over that period, which is considerably more than what Ugandan authorities reported to UN Comtrade.

Moreover, Uganda and Kenya share a border and transportation by water from Western Kenya, where most of the country's gold is being

extracted, to Kampala, which lies on the shore of Lake Victoria and has several known gold refineries, makes much sense in terms of logistics. Finally, there are reports of gold flows between the two countries (see below).

In the case of **Rwanda**, declarations on the country of origin of gold imports could be just as problematic as with Uganda, since Rwanda is another major transit hub for gold from the Eastern DRC, which is widely acknowledged as conflict gold and whose true origin traders have an incentive to mask (see country profiles Rwanda and DRC). And Rwanda does not have a common border with Kenya. It is therefore difficult to draw conclusions based on the observed trade gap between the two countries. That said, it cannot be excluded that Rwanda may be the destination for part of the gold that is smuggled each year out of Kenya.

Exports of gold from Kenya to Switzerland versus mirror data: weight

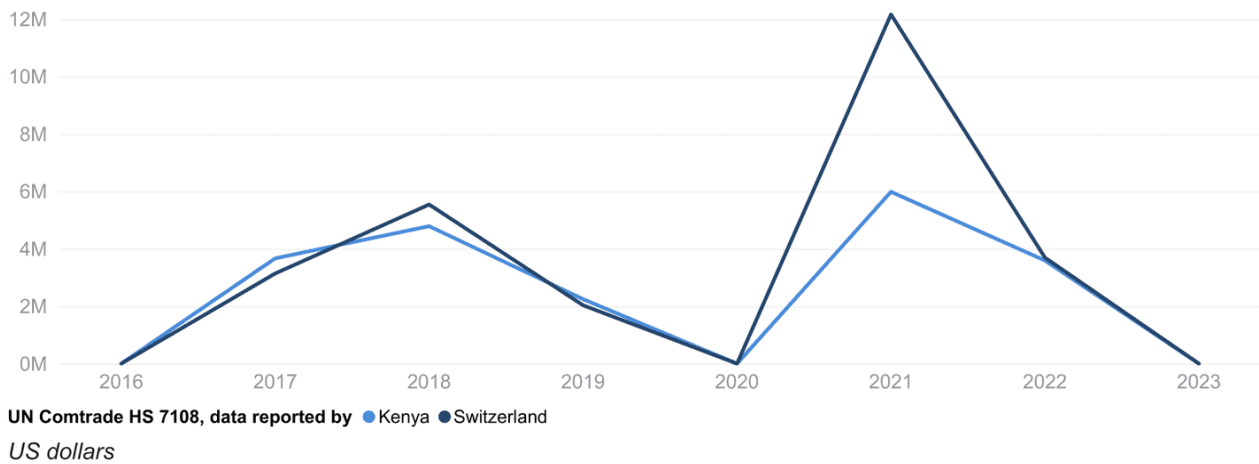


UN Comtrade HS 7108, data reported by Kenya Switzerland

Kilogrammes

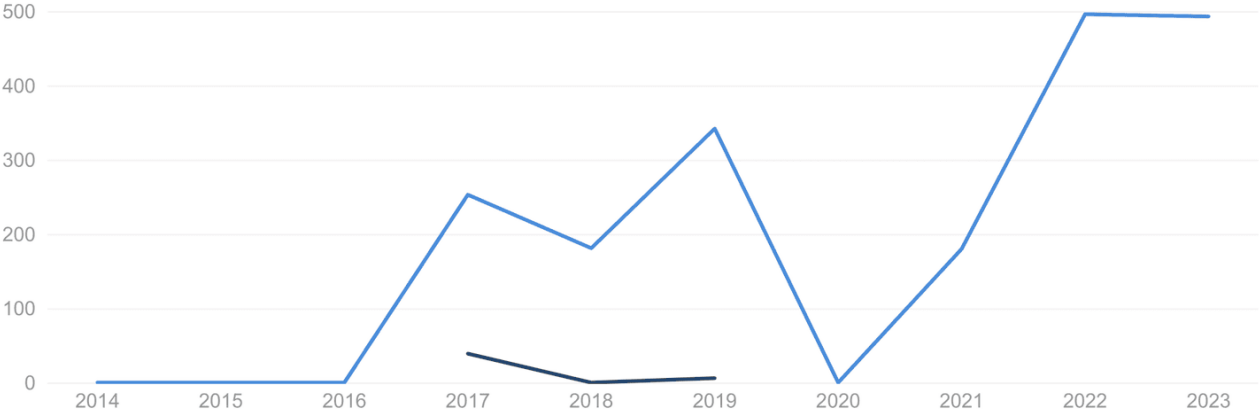
Data reported by Kenyan authorities for the years 2017-2018 is patently erroneous and has therefore been left out.

Exports of gold from Kenya to Switzerland versus mirror data: value



As the graphs above show, one can observe the same trend in reported gold exports from Kenya to **Switzerland** as in their mirror image. The gaps are small for all years except 2021, for which the Kenyan authorities reported exports of 134 kg or almost USD 6 million to Switzerland, whereas the Swiss authorities reported imports of 247 kg or almost USD 12.2 million from Kenya. That gap can most likely be explained by **faulty Kenyan reports to UN Comtrade**, for the Kenyan authorities reported weights of zero (but commercial values between USD 210,036 and 1,035,360) for six of the twelve months of that year.

Exports of gold from Kenya to South Africa: weight

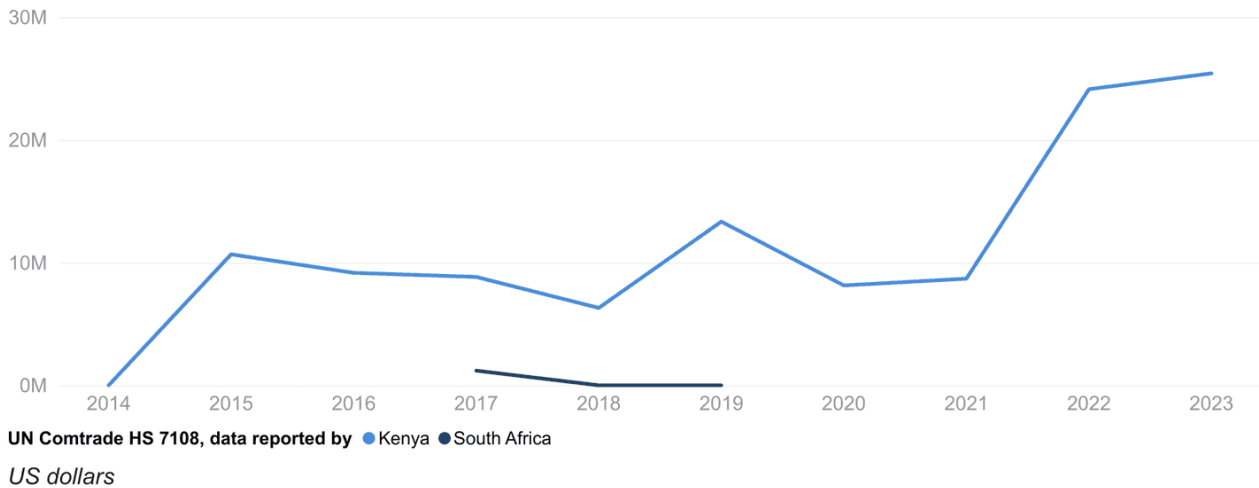


UN Comtrade HS 7108, data reported by Kenya South Africa

Kilogrammes

Data reported by Kenyan authorities for the year 2017 is patently erroneous and has therefore been corrected by SWISSAID using a hypothetical weight calculated on the basis of the reported trade value.

Exports of gold from Kenya to South Africa: value



As mentioned above, South African statistics on gold imports are incomplete³¹, so the trade gap between Kenya and South Africa can hardly be analysed.

Focusing on data reported by Kenyan authorities to UN Comtrade, one can see that some figures are missing: reported total weights, unlike reported total commercial values, are zero for several years.

ILLEGAL GOLD EXPORTS

The vast majority of the gold that is shipped from Kenya is not declared for export. The authors of the National Action Plan for Artisanal and Small-scale Gold Mining in Kenya (NAP) acknowledge this: “Since the gold is traded informally this is never reported in government statistics” (MEF 2022: 24). They further explain that “selling of gold is mainly concentrated at the mining sites and local market centres. Gold trade in the ASGM communities is therefore **largely informal**, locally organized and **across the borders**” (MEF 2022: 34, emphasis added).

The existence of cross-border gold smuggling out of Kenya is widely recognised. For instance, replying to a question from SWISSAID regarding the scale of ASM gold production in Kenya, the Kenya

Chamber of Mines, wrote: “due to a lack of proper structure, **prominent smuggling**, and lack of proper implementation of record keeping in the ASGM mines and royalty collection, the data is not easy to aggregate” (emphasis added)³².

Yet, the scale of gold smuggling out of Kenya is very hard to assess. To the best of SWISSAID’s knowledge, there exists no estimate of the volumes involved³³. As a researcher working for Impact, a Canadian NGO, writes in a blog posted in 2021, “the true extent of the trade in Kenya—with respect to gold originating both in Kenya and elsewhere—remains unknown. Some have estimated figures of illicit gold leaving Kenya as approximately 2.9 tons in 2018, worth over \$100 million USD based on Kenyan imports declared by the UAE. Crime analysts and a gold trader based in Nairobi who spoke with IMPACT’s researcher believe these figures are a massive underestimation. Supporting the hypothesis that Kenya could be serving as a larger transit hub for illicit gold is a growing recognition that much of the production from South Sudan’s nascent yet gold rich artisanal mines is heading to Nairobi” (Impact 2021). If we follow this reasoning, **smuggling of gold from Kenya could reach a low two-digit figure in tonnes per year.**

In terms of the destination of illicit gold flows from Kenya, available accounts reveal the existence of both a regional and a global traffic.

At the regional level, **gold is smuggled from Kenya to neighboring countries such as Uganda, Tanzania and Somalia.** Regarding the first two countries, GI-TOC explains that: “In recent years, Kenyan gold is more likely to be smuggled out of the country than in the past. While gold flows in both directions across the Uganda-Kenya border, there is evidence of increasing amounts now leaving Kenya for Uganda. Recent evidence shows that flows from Tanzania into Kenya have subsided, and now gold flows in both directions with increased flows from Kenya into Tanzania becoming apparent during the pandemic. For example, some

dealers in the Migori and Kisumu areas are now selling gold in Tanzania rather than Nairobi. Also, in May 2020, the Tanzanian government seized more than 27 kilograms of Kenyan gold (valued at over US\$1.5 million) from a would-be smuggler at Sirari border point, close to the Migori mining area” (GI-TOC 2021: 34). About the gold traffic between Kenya and Somalia, GI-TOC writes: “In northern Kenya, there have been reports that Somali gold traders are stockpiling gold and moving it directly to Somalia” (GI-TOC 2021: 25). However, the NGO’s findings indicate that, once accumulated in Somalia, gold from Kenya is likely to re-enter that country: “A limited amount of gold is thought to be smuggled out of northern Kenya. It is reported that gold is being moved to Somalia by Somali traders based in Turkana and West Pokot counties. It is reportedly consolidated in Somalia before being moved to Nairobi for export” (GI-TOC 2021: 34).

Illicit gold flows from Kenya to other countries in East Africa could be linked with illicit flows of mercury, for supply chains of both metals are often intertwined (Impact 2021). As the authors of the National Action Plan on Artisanal and Small-Scale Gold Mining in Kenya observe: “The bulk of mercury used in ASGM is from illegal trade within the country and across the borders. Key informant interviews revealed that there is cross border illegal trade of mercury between Kenya, Tanzania and Uganda, where the movement is determined by price variations. For example, when mercury is cheaper in Uganda, traders will tend to buy from there and vice versa in the three East African countries” (MEF 2022: 33). French researcher Joseph Bohbot provided additional detail regarding the “illegal trade [in mercury] within the country” mentioned above: according to him, Indian industrialists supply mercury to artisanal gold miners by “by taking it out of the circuits for which it is normally intended”³⁴.

A connection may also exist between gold and cyanide flows. Interviews

conducted in 2023 by Bohbot indicate that cyanide, which is used for processing mine tailings through lixiviation, originates from South Korea and China but is shipped by sea to South Africa and then transported to Kenya, including through Tanzania (Bohbot 2024)³⁵.

At the global level, **gold is smuggled from Kenya to the UAE, India, South Africa and perhaps China**. The capital city of Nairobi and its international airport, Jomo Kenyatta International Airport, play a key role in this traffic. GI-TOC writes that “gold trading also takes place in the Nairobi Central Business District and Karen neighbourhoods. The trade in these areas is more formal, with many buyers holding gold trading licences. Buyers are often Indian or European nationals. From Nairobi, gold is moved to the UAE, China and India. One gold dealer also reported that some is also shipped to Asia and Europe through South Africa” (GI-TOC 2021: 34). GI-TOC acknowledges that China’s role as a destination for illicit gold from Kenya is suspected, not established: “The destination of gold mined and bought illegally by Chinese nationals remains unclear. It is suspected that the gold is smuggled to China through the main international airport in the country of origin. A Kenyan interviewee reported that he had assisted in moving gold to Nairobi where the Chinese nationals they were working with had the necessary connections to move the gold out of the country” (GI-TOC 2021: 29).

Nairobi may have licensed gold traders and “more formal” forms of precious metals trading, as GI-TOC notes in the quote above, but that does not mean all shipments of gold from Kenya’s capital city are done in accordance with the law, quite the contrary. The **UAE**, for instance, appear as a destination country for gold exports from Kenya in data reported by Kenyan authorities to UN Comtrade. However, as highlighted above, figures on exports are significantly lower than their mirror image, namely figures on imports of gold from Kenya reported by Emirati authorities, which points to the bilateral gold trade between the two

countries being mostly clandestine (from the Kenyan perspective).

As regards **India**, the country barely appears as a destination for gold exports from Kenya, whether in data reported to UN Comtrade by the Kenyan authorities or by their Indian counterparts. However, several mediated customs seizures, in both Kenya and India, made clear that organised smuggling networks send couriers from one country to the other (see, e.g. [KRA 2021](#), [Indian Express 2025](#), [The Indian Express 2024](#), [Hindustan Times 2024](#), [The Indian Express 2025](#)). And the Canadian NGO Impact observes in report published in 2019 that “Nairobi has become a magnet for Congolese and South Sudanese gold, the latter of which is often exported as ‘gold sand’ (small, grain-like beads) and **easily transported by smugglers on direct flights to Mumbai**” ([Impact 2019: 27](#), emphasis added).

New developments may somewhat reduce illicit gold flows out of Kenya in coming years. The Gold Processing Bill, which had not yet been enacted by Kenya’s National Assembly at the time of writing (March 2025), aims to curb illegal mining and the black-market gold trade ([Kahawa Tungu 2025](#)) by regulating gold processing and placing gold refineries under increased state control (through the creation of the Gold Processing Corporation). In parallel, a new gold refinery may start operating in Kakamega County, a key gold mining region, which could help bring gold flows into more formal channels.

At the same time, another recent development, namely the launch of a gold market at BBS Mall in Eastleigh in February 2025, is more ambiguous. Touted as “the largest gold souk in East and Central Africa” ([Citizen Digital 2025](#)), the market is meant to host not only jewellery shops but also gold traders and raw gold processors. It is aimed at placing Nairobi on the map for international buyers and making gold shipments to Dubai redundant. Cabinet Secretary for Mining, Blue Economy, and Maritime Affairs, Hassan Joho, who presided over the

“grand opening”, acknowledged that raw gold would flow into the Gold Souk from the Western and Northern parts of Kenya, and reminded dealers that they needed to obtain proper licenses to conduct business in a legitimate way ([The Standard 2025](#)).

Finally, there are indications that corrupt political elites are involved in gold smuggling out of Kenya. An expert consulted by SWISSAID stressed that smuggling networks shipping gold out of the country enjoy the backing of “politicians”³⁶. Likewise, the event described above, in which three tonnes of gold from the DRC on its way to Dubai “mysteriously vanished” from Nairobi’s international airport, according to Congolese authorities ([KTN 2024](#)), suggests that high-ranking state officials in Kenya are involved in smuggling schemes, because such large volumes of precious metal rarely if ever disappear without a trace. SWISSAID has not yet fully investigated this issue.

-
1. A Kenyan official’s response to SWISSAID, 11 February 2025. It should be noted that Kenyan official figures on gold production in recent years are very close to those on gold exports, but do not match them exactly. 
 2. A Kenyan official’s response to SWISSAID, 11 February 2025. 
 3. A Kenyan official’s response to SWISSAID, 11 February 2025. 
 4. Cyrus Njonde’s response to SWISSAID, 7 February 2025. 
 5. Joseph Bohbot’s response to SWISSAID, 25 January 2025. 
 6. Edward Ndirangu’s response to SWISSAID, 10 February 2025. 
 7. An expert on Kenyan mining’s response to SWISSAID, 10 February 2025. 
 8. Charlie Tryon’s response to SWISSAID on LinkedIn, 10 November 2021. 
 9. Kenyan gold expert’s response to SWISSAID, 8 December 2023. 
 10. This project seems to have been born from exploration activities

initiated by Acacia Mining. in a document released in 2022, the Kenyan Ministry of Environment and Forestry (MEF) refers to Acacia Mining (alongside Karebe and Kilimapesa) as one of the country's main "gold exploration and mining companies" (MEF 2022: 24). And in a communiqué dated August 2020, Acacia Mining announces the sale of its exploration activities in Kenya to Shanta Gold (Acacia Mining 2020). ↩

11. Joseph Bohbot's response to SWISSAID, 25 January 2025. ↩
12. An independent expert on Kenyan ASM's response to SWISSAID, 3 March 2025. ↩
13. An independent expert on Kenyan ASM's response to SWISSAID, 3 March 2025. ↩
14. An independent expert on Kenyan ASM's response to SWISSAID, 3 March 2025. ↩
15. An independent expert on Kenyan ASM's response to SWISSAID, 3 March 2025. ↩
16. An independent expert on Kenyan ASM's response to SWISSAID, 3 March 2025. ↩
17. Joseph Bohbot's feedback on SWISSAID's analysis, 13 March 2025. ↩
18. An independent expert on Kenyan ASM's response to SWISSAID, 3 March 2025. ↩
19. Charlie Tryon's response to SWISSAID, 11 November 2021. ↩
20. An independent expert on ASM in Kenya's response to SWISSAID, 3 March 2025. Another expert, Joseph Bohbot, also pointed to Eastleigh's crucial role as a hub for accumulating gold before export and mentioned that traders based there purchase not only mined gold but also gold jewelry. Joseph Bohbot's feedback on SWISSAID's analysis, 13 March 2025. ↩
21. For instance, KNBS published the figures 229,442,114.0 grammes (229.4 tonnes) and 166,443,447.0 grammes (166.4 tonnes) for the years 2019 and 2020, respectively. This would imply that Kenya was the main gold-exporting country in Africa for those years. But

Kenya does not even appear in top-ten rankings (see, e.g. [Business Insider Africa 2024](#)), regardless of the year. ↩

22. KCM's response to SWISSAID, 4 October 2023. In that email, KCM only communicated figures on exports for two years (2019 and 2020). More than a year later, SWISSAID attempted to obtain figures for other years as well from KCM, but received no reply. ↩
23. For instance, there is no data on gold exports for the year 2014. ↩
24. For instance, the figures for the years 2013 (28.6 tonnes) and 2017 (396.4 tonnes) are obviously too high to be correct. Those for 2016, 2018 and 2020 do not include the weights of gold exports from Kenya to South Africa, which are given as zero. ↩
25. For instance, the figure for 2018 includes a reported total weight of gold exports from Kenya to Switzerland (14.1 tonnes) that does not correspond at all with the reported total commercial value (USD 4.8 million) of those exports. ↩
26. KNBS's response to SWISSAID, 25 March 2023. ↩
27. SWISSAID's follow-up questions to KNBS, 25 March 2023. ↩
28. KNBS's response to SWISSAID, 20 September 2023. ↩
29. KNBS's response to SWISSAID, 8 November 2023. ↩
30. This data is a key source of information on the destination of gold from individual countries, including African countries. It originates from the reports that all refiners certified according to the LBMA standard must submit. However, the LBMA then only releases this data in aggregated form (per country, when four or more refineries are based in the same country, otherwise per region), to avoid disclosing information about each refinery. In the past, this data only appeared in the LBMA's Sustainability and Responsible Sourcing Reports (see [LBMA 2020: 37](#) for 2018, [LBMA 2021: 47](#) for 2019, [LBMA 2022: 28](#) for 2020 and [LBMA 2023: 32](#) for 2021). Since 2024, it can be accessed on a dedicated webpage: [LBMA Country of Origin Data](#). ↩
31. South African authorities did report to UN Comtrade figures on gold

imports from Kenya for two years, namely 2017 and 2019. However, those for 2019 are obviously problematic (the ratio of reported commercial value to reported weight results in a wholly unrealistic gold price) and those for 2017 seem to be incomplete (the monthly view shows that data is available for only three months and most likely missing for the nine other months of the year).↩

32. Kenya Chamber of Mines's response to SWISSAID, 6 September 2023.↩
33. Customs seizures can serve as an indicator, but they often reveal only the tip of the iceberg. Moreover, many of the customs seizures that have been mediated in Kenya in recent years are related to gold scams that involved fake gold or no gold at all. Obviously, those cases cannot serve as an indicator of the volumes of precious metal effectively being shipped out of the country.↩
34. Joseph Bohbot's feedback on SWISSAID's analysis, 13 March 2025.↩
35. Joseph Bohbot's feedback on SWISSAID's analysis, 13 March 2025.↩
36. An independent expert on Kenyan ASM's response to SWISSAID, 3 March 2025.↩

SWISSAID

Lorystrasse 6a

3008 Bern

africangold@swissaid.ch

www.swissaid.ch

+41 (0)31 350 53 53

