

# Chronology of Events:

## The “Independent Assessment” of human rights concerns at Barrick’s North Mara Gold Mine, Tanzania

[\[Click on each date for further detail\]](#)

 **18 June 2019**

Forbidden Stories reports on human rights violations at Acacia Mining/Barrick’s North Mara Gold Mine in Tanzania. MMTC-PAMP named as refining the tainted gold.

 **28 June 2019**

MMTC-PAMP responds to Forbidden Stories and announces expert site visit.

 **18 – 25 July 2019**

RAID reaches out to PAMP/MMTC-PAMP, which says it will inform RAID when the expert is appointed.

 **23 September – 17 October 2019**

RAID chases up on appointment of expert.

 **24 October 2019**

RAID writes to the LBMA to clarify its oversight role including follow-up with PAMP/MMTC-PAMP.

 **1 – 6 November 2019**

RAID arranges to have staff in North Mara in anticipation of the expert’s site visit.

LBMA confirms to RAID it is actively engaged with MMTC-PAMP over North Mara and agrees to a meeting with RAID.

 **7 – 12 November 2019**

Synergy Global Consulting appointed as expert assessor but MMTC-PAMP refuses to disclose TORs.

 **14 November 2019**

MMTC-PAMP states TORs drawn up with Barrick and the LBMA are confidential but commits to making “outcomes” public.

 **16 November 2019**

Assessor evasive over meeting with RAID during site visit.

 **17 November 2019**

MMTC-PAMP explains Barrick “not comfortable” for safety reasons for the assessor to meet with RAID or victims in the community during the site visit.

 **18 November 2019**

RAID offers to meet the assessor and PAMP/MMTC-PAMP’s representative at the mine’s offices, but MMTC-PAMP refuses saying plans for the site visit are now finalised.

 **20 – 22 November 2019**

RAID informs PAMP/MMTC-PAMP of serious concerns over the failure to meet victims and the degree of control exercised by Barrick over the site visit.

LBMA delays meeting with RAID but confirms it has discussed North Mara with PAMP at its offices in Switzerland.

#### **4 December 2019**

At RAID's request, the Synergy assessor finally meets with RAID in the UK.

#### **5 December 2019**

RAID informs the LBMA of the assessor's failure to meet victims in North Mara due to Barrick's and/or PAMP/MMTC-PAMP's intervention.

#### **12 – 19 December**

The LBMA postpones its conference call with RAID until after it has received the expert's report.

#### **10 – 14 January 2020**

The LBMA further delays meeting with RAID until mid-February.

#### **7 February 2020**

The LBMA postpones meeting with RAID because it has not received the assessment report from PAMP/MMTC-PAMP.

#### **9 – 12 February 2020**

RAID informs LBMA about legal action by North Mara victims in the UK and agrees a new date to meet.

RAID again asks to meet PAMP/MMTC-PAMP and enquires about publication of the assessor's report.

#### **17 February 2020**

MMTC-PAMP backtracks on its commitment to publish the "outcomes" of the assessor's report.

#### **10 March 2020**

The LBMA informs RAID that it is unlikely it will have sight of the assessor's report prior to meeting.

#### **17 March 2020**

During virtual meeting (due to Covid-19), LBMA confirms an Incident Review is underway but that it is satisfied with PAMP/MMTC-PAMP's past due diligence.

LBMA agrees to receive RAID's further written comments and to meet RAID once it has reviewed the assessment report.

#### **23 April 2020**

RAID sets out in writing to the LBMA our key concerns to feed into the PAMP/MMTC-PAMP Incident Review and calls for the assessor's report to be made public.

#### **1 May 2020**

RAID draws to the LBMA's attention a judgment against EY (PAMP/MMTC-PAMP's supply chain auditors) concerning awarding damages to a whistleblower forced out of his job after flagging evidence of money laundering at a Dubai gold refinery.

#### **4 – 13 May 2020**

LBMA responds to RAID about EY but makes no public statement.

#### **15 May 2020**

RAID writes to PAMP/MMTC-PAMP repeating its request to meet and seeking clarification about how PAMP has conducted its supply chain due diligence.

 **25 May 2020**

PAMP/MMTC-PAMP finally agrees to a conference call with RAID.

 **2 June 2020**

Conference call between RAID and PAMP/MMTC-PAMP takes place in which PAMP refuses to answer RAID's questions about its due diligence until after the assessment process is complete.

 **11 June 2020**

MMTC-PAMP briefly posts "Executive Summary on Independent Report on North Mara" on its website before taking it down within hours.

 **12 June 2020**

LBMA reacts to news of LBMA Good Delivery listed Perth Mint's role in sourcing gold associated with human rights violations and environmental destruction in Papua New Guinea by announcing an Incident Review.

 **16 June 2020**

RAID writes to the LBMA asking about the status of the assessor's report and the PAMP/MMTC-PAMP Incident Review.

The LBMA says it has been following up with EY entities over due diligence and that it will report publicly on its wider auditor review.

For the first time, the LBMA refers to receiving a report on North Mara from PAMP/MMTC-PAMP .

 **17 June 2020**

RAID again calls upon the LBMA to provide a full and public response on the implications of the EY judgment for the LBMA's supply chain auditing.

RAID seeks clarification over when the LBMA received Synergy's report, the next steps under the PAMP/MMTC-PAMP Incident Review and provision for the receipt of further information from RAID.

 **3 July 2020**

RAID submits its analysis of the executive summary of Synergy's North Mara Gold Mine Assessment to the LBMA under the PAMP/MMTC-PAMP Incident Review.

Around the same time as RAID makes its submission to the LBMA, MMTC-PAMP posts a press release entitled "North Mara Gold Mine – Statement" on its website.

 **6 July 2020**

The LBMA acknowledges receipt of RAID's submission, undertaking to be in touch once it has reviewed the submission.

 **7 July 2020**

PAMP replies to RAID, reproducing the content of MMTC-PAMP's 3 July press release, but failing to answer RAID's detailed questions on past due diligence, previous site visits to the North Mara mine, consultation with affected stakeholders, and the suspension of trading.

 **8 July 2020**

RAID provides an update to the LBMA on its submission, taking into consideration MMTC-PAMP's public statement.

 **18 June 2019**

***Forbidden Stories reports on human rights violations at Acacia Mining/Barrick's North Mara Gold Mine in Tanzania. MMTC-PAMP named as refining the tainted gold.***

*Forbidden Stories* and its network of journalists report on the human rights violations and environmental damage at Acacia Mining's North Mara gold mine in Tanzania (since then it has been fully acquired and renamed by Barrick. MMTC-PAMP, the Indian refinery of major Swiss bullion house MKS PAMP Group, is named as sourcing gold from North Mara, which is then sold down the supply chain to the likes of Apple, Nokia and Canon. [\[Back to top\]](#)

 **28 June 2019**


***MMTC-PAMP responds to Forbidden Stories and announces expert site visit.***

Refiner stands by its due diligence but announces site visit with an independent expert to North Mara mine. [\[Back to top\]](#)

 **18 – 25 July 2019**

***RAID reaches out to PAMP/MMTC-PAMP, which says it will inform RAID when the expert is appointed.***

By letter and tele-conference, RAID provides background to the work it has conducted in North Mara, including materials documenting serious human rights abuses at the mine. PAMP/MMTC-PAMP offers no information regarding its due diligence to date, but confirms that it will inform RAID once the expert who will conduct the assessment has been appointed. On 25 July, RAID sends follow-up RAID memo on North Mara, asks for confirmation of when MMTC-PAMP first signed a contract with North Mara and requests to brief the expert when they are appointed. [\[Back to top\]](#)

 **23 September – 17 October 2019**

***RAID chases up on appointment of expert.***

On 23 September, RAID writes to enquire whether the expert has been appointed yet, confirming our expectation that they would consult broadly, and requesting information as to how we may contact them. MMTC-PAMP responds the following day saying that it anticipates the expert would want to consult RAID "early on".

On 17 October, after RAID follows up again, MMTC-PAMP advises that it has set the week of 18 November as the "tentative time" for the on-the-ground assessment. RAID reiterates that it is keen to engage with the expert to help facilitate contact with local civil society groups and victims. RAID requests the assessment's terms of reference. [\[Back to top\]](#)

 **24 October 2019**

***RAID writes to the LBMA to clarify its oversight role including follow-up with PAMP/MMTC-PAMP.***

RAID's letter to the London Bullion Market Association (LBMA), asks for a meeting to discuss the LBMA's certification of gold as responsibly sourced and its oversight role. RAID requests documents and policies referred to on the LBMA's website, but which are not publicly posted (such as the Sanctions Policy). RAID also asks to discuss how the LBMA is following-up with MMTC-PAMP, a refiner on the LBMA's Good Delivery List, which should be complying with the LBMA's responsible sourcing requirements. [\[Back to top\]](#)

 **1 – 6 November 2019**

***RAID arranges to have staff in North Mara in anticipation of the expert's site visit.***

Prior to early November, RAID receives no further information from PAMP about the expert or terms of reference (TORs), other than it was still organising the assessment with the mine and "potential consultant". Because of the increasingly short timeline, RAID arranges to have staff in North Mara for the week of 18 November 2019 to meet with the expert and facilitate contact with local community groups.

On 6 November, RAID informs PAMP of these arrangements and says RAID staff would be ready to meet the expert in North Mara the week of 18 November.

***LBMA confirms to RAID it is actively engaged with MMTC-PAMP over North Mara and agrees to a meeting with RAID.***

On 1 November, LBMA responds to RAID stating it is “actively engaged with MMTC-PAMP on the situation around North Mara” and has made recommendations on the scope of the independent assessment. It describes RAID’s reporting on North Mara as “helping to shape our engagement with MMTC-PAMP”. The LBMA agrees to meet RAID to understand how the refiner has responded to RAID’s engagement and to talk through the LBMA’s policies and processes. [\[Back to top\]](#)

 **7 – 12 November 2019**

***Synergy Global Consulting appointed as expert assessor but MMTC-PAMP refuses to disclose TORs.***

On 7 November, MMTC-PAMP advises RAID that it has appointed Synergy Global the preceding day and confirms that the on-the-ground assessment will be the week of 18 November 2019. Between 9 – 12 November, RAID seeks further information about the site visit and the TORs, which MMTC-PAMP refuses to provide. On 10 November, RAID contacts Synergy Global directly and offers to help facilitate meetings with members of the local community during the site visit. The assessor advises he will get back “as soon as possible on next steps”.

On 9 November, RAID asks to meet the LBMA in December after the site visit has taken place. [\[Back to top\]](#)

 **14 November 2019**

***MMTC-PAMP states TORs drawn up with Barrick and the LBMA are confidential but commits to making “outcomes” public.***

MMTC-PAMP declines to share TORs on the basis that these “were established in collaboration between the independent expert, the mine, the LBMA and us. It is not a public document to start with, so it cannot be shared as a result.” MMTC-PAMP does, however, commit to publishing the “outcomes” of the expert’s report.

MMTC-PAMP confirms that its representative will be accompanying the expert and “would be happy to meet with [RAID staff] on the ground if it is practically possible.” [\[Back to top\]](#)

 **16 November 2019**

***Assessor evasive over meeting with RAID during site visit.***

Having heard nothing, RAID again asks the assessor for a meeting, who replies suggesting “you [RAID] get in touch with MMTC-PAMP regarding meeting.”

RAID emails PAMP/MMTC-PAMP explaining: “we find the situation perplexing since we have been in touch with you since June expressing our interest to meet with the independent expert. We are now just days before the visit is due to take place and no meeting time or place has yet been fixed. We have also offered repeatedly to put the independent expert in touch with local victims and/or their families so he/she can get the broadest view possible of the human rights situation.... time is running short.” [\[Back to top\]](#)

 **17 November 2019**

***MMTC-PAMP explains Barrick “not comfortable” for safety reasons for the assessor to meet with RAID or victims in the community during the site visit.***

MMTC-PAMP claims that PAMP/MMTC-PAMP has placed no restrictions on whom Synergy meets with but “due to the sensitivities of the situation” and as Barrick are responsible for logistics, “they do not feel comfortable to take responsibility for the safety and well-being of the Synergy team during meetings that have been organised by 3rd parties in the community.” MMTC-PAMP confirms that Synergy will therefore not meet with RAID staff in North Mara but will contact RAID later. [\[Back to top\]](#)

 **18 November 2019**

***RAID offers to meet the assessor and PAMP/MMTC-PAMP’s representative at the mine’s offices, but MMTC-PAMP refuses saying plans for the site visit are now finalised.***

Unconvinced by concerns over safety, RAID expresses its concern that limits are being placed on the assessment. RAID further informs PAMP/MMTC-PAMP that victims and community representatives might be willing to meet at the mine’s offices.

MMTC-PAMP refuses RAID's offer because it does not consider Barrick's mine offices "a neutral environment" and because it has finalised plans for the visit and "no additional meeting could be arranged during the day we are on site without compromising the planning." MMTC-PAMP assures RAID that its representative on the site visit will contact us later. [\[Back to top\]](#)

#### 20 – 22 November 2019

***RAID informs PAMP/MMTC-PAMP of serious concerns over the failure to meet victims and the degree of control exercised by Barrick over the site visit.***

RAID says that, to its knowledge, neither PAMP/MMTC-PAMP nor Synergy's assessor met or corresponded with any Tanzanian civil society members, including the most prominent national human rights group, the Legal and Human Rights Centre (LHRC), which has repeatedly documented and published its concerns about the human rights situation at the North Mara mine. RAID was also unable, despite extensive efforts, to identify any victims or local leaders with whom the assessor or PAMP/MMTC-PAMP's representative met while on the ground conducting the assessment, suggesting that any community members or representatives they did meet were selected by Barrick.

On 22 November, RAID again asks to meet PAMP/MMTC-PAMP's representative from the site visit. There was no response.

***LBMA delays meeting with RAID but confirms it has discussed North Mara with PAMP at its offices in Switzerland.***

On 22 November, the LBMA responds that meeting RAID in December might be difficult but suggests a conference call and a meeting in early January. It informs RAID that the LBMA's due diligence policy and Good Delivery List (GDL) are being updated. Other process documents are not provided. On its interaction with the refinery, the LBMA confirms its responsible sourcing manager "visited PAMP a few weeks ago, and had the opportunity to discuss North Mara at length with the team there. There has definitely been a lot of co-operation on their part...". [\[Back to top\]](#)

#### 4 December 2019

***At RAID's request, the Synergy assessor finally meets with RAID in the UK.*** [\[Back to top\]](#)

#### 5 December 2019

***RAID informs the LBMA of the assessor's failure to meet victims in North Mara due to Barrick's and/or PAMP/MMTC-PAMP's intervention.***

RAID expresses its serious concern over the failure of Synergy to meet with victims, RAID or Tanzanian civil society because of the obstruction of these meetings by Barrick and/or PAMP/MMTC-PAMP. PAMP/MMTC-PAMP's representative also failed to meet RAID staff during the site visit. RAID confirms a conference call with the LBMA for 16 December. [\[Back to top\]](#)

#### 12 – 19 December

***The LBMA postpones its conference call with RAID until after it has received the expert's report.***

The LBMA suggests that a call with RAID after it has received Synergy's report will be "more productive, so we have some idea of what the report is saying and the work done."

On 13 December, RAID confirms its availability for a call on 7 January 2020. On 19 December, the LBMA does not commit to a date for the call but to scheduling a call after it has received the Synergy report. [\[Back to top\]](#)

#### 10 – 14 January 2020

***The LBMA further delays meeting with RAID until mid-February.***

The LBMA advises RAID, "the North Mara assessment will be sent through later this month. We'd therefore suggest that we schedule a meeting mid-February to allow us time to review the findings and engage with the relevant parties if necessary." On 14 January, RAID confirms its availability and a date is fixed for 12 February. On 24 January, the LBMA asks for the meeting to be rescheduled for 17 February. [\[Back to top\]](#)



## 7 February 2020

***The LBMA postpones meeting with RAID because it has not received the assessment report from PAMP/MMTC-PAMP.***

The LBMA informs RAID that PAMP is not “in a position to share the report” with the LBMA as it “will still be going through internal review.” If the meeting with RAID was to go ahead as planned, the LBMA would “not be able to comment on any specifics of the way the North Mara assessment took place and will only be able to note your concerns.” [\[Back to top\]](#)

## 9 – 12 February 2020

***RAID informs LBMA about legal action by North Mara victims in the UK and agrees a new date to meet.***

On 9 February, RAID proposes meeting the LBMA in early March to discuss its oversight of responsible sourcing and the expert’s report (if the LBMA has received it by then). On 11 February, LBMA responds and a new date is fixed for 17 March.

On 12 February, RAID draws the LBMA’s attention to the filing of claims by human rights victims in the British High Court against Barrick subsidiaries that own and operate North Mara mine. All but one of the claims relate to incidents within the last three years, and RAID hopes their non-historical nature is being taken into consideration by MMTC-PAMP. The LBMA responds same day, stating it is aware of the claims but interested to learn more.

***RAID again asks to meet PAMP/MMTC-PAMP and enquires about publication of the assessor’s report.*** [\[Back to top\]](#)

## 17 February 2020

***MMTC-PAMP backtracks on its commitment to publish the “outcomes” of the assessor’s report.***

MMTC-PAMP informs RAID that the assessment process is “ongoing” and that when completed, “we shall consider if and how we can make the related outcomes public” (emphasis added). [\[Back to top\]](#)

## 10 March 2020

***The LBMA informs RAID that it is unlikely it will have sight of the assessor’s report prior to meeting.*** [\[Back to top\]](#)

## 17 March 2020

***During virtual meeting (due to Covid-19), LBMA confirms an Incident Review is underway but that it is satisfied with PAMP/MMTC-PAMP’s past due diligence.***

RAID conveys its concerns about the failure by both the assessor and PAMP/MMTC-PAMP to meet RAID and victims during the site visit and the control exercised by Barrick. RAID enquires about the status of the assessor’s report and is told it is being reviewed by Barrick’s legal department. The LBMA says it has visited PAMP’s Swiss offices to review the refiner’s past due diligence concerning North Mara mine. The LBMA confirms that its Incident Review of PAMP/MMTC-PAMP is underway.

***LBMA agrees to receive RAID’s further written comments and to meet RAID once it has reviewed the assessment report.***

Following up by email same day, the LBMA agrees to receive RAID’s further written comments and to keep RAID’s concerns “front of mind when reviewing Synergy’s assessment.” After it has reviewed Synergy’s assessment, the LBMA confirms it will again meet with RAID. [\[Back to top\]](#)

## 23 April 2020

***RAID sets out in writing to the LBMA our key concerns to feed into the PAMP/MMTC-PAMP Incident Review and calls for the assessor’s report to be made public.***

RAID’s submission to the LBMA sets out (i) concerns regarding PAMP/MMTC-PAMP’s conduct of the assessment, including the failure to meet victims and civil society; (ii) the inadequacy of PAMP’s prior due diligence on the North Mara mine given the publicly reported record of human rights violations; (iii) clarifications about the Incident Review Process, including what information would be provided to RAID; (iv) questions about the LBMA’s wider processes and governance, including repeating our request for LBMA

documentation and policies. RAID stresses the importance of publishing the assessor's report if the PAMP/MMTC-PAMP Incident Review is to be seen as credible. [\[Back to top\]](#)

#### **1 May 2020**

***RAID draws to the LBMA's attention a judgment against EY (PAMP/MMTC-PAMP's supply chain auditors) concerning awarding damages to a whistleblower forced out of his job after flagging evidence of money laundering at a Dubai gold refinery.***

RAID raises with the LBMA the High Court's findings in the case of Rihan vs EY Global Ltd that EY committed professional and ethical misconduct, orchestrated by senior management, in its handling of the audit of a Dubai gold refiner, to ensure evidence of money laundering was not reported to authorities, including the LBMA. Given that EY entities are LBMA Approved Service Providers, RAID calls for the LBMA to publicly set out the steps it will be taking in response to the judgment. [\[Back to top\]](#)

#### **4 – 13 May 2020**

***LBMA responds to RAID about EY but makes no public statement.***

The LBMA confirms the LBMA is familiar with the court's findings on EY and states it takes the audit programme very seriously and is "in contact with the EY entities that form part of the LBMA Approved Service Providers List," but clarifies that "these entities were not a party to the proceedings". It also says the LBMA has "routinely been in close contact with the EY entities, which also includes when the news first broke in 2014/when there has been any other additional news on this matter. Each firm is aware of the seriousness of the matter, and are providing us with more information on their systems and controls, for our review."

On 13 May 2020, RAID responds pointing out that "an important feature of the judgment is that it found that authority over decision-making in relation to the relevant assurance matters was exercised by global leadership.... The locally based EY entities were considered subordinate to EY Global under their contractual arrangements and in the cover-up." [\[Back to top\]](#)

#### **15 May 2020**

***RAID writes to PAMP/MMTC-PAMP repeating its request to meet and seeking clarification about how PAMP has conducted its supply chain due diligence.*** [\[Back to top\]](#)

#### **25 May 2020**

***PAMP/MMTC-PAMP finally agrees to a conference call with RAID.*** [\[Back to top\]](#)

#### **2 June 2020**

***Conference call between RAID and PAMP/MMTC-PAMP takes place in which PAMP refuses to answer RAID's questions about its due diligence until after the assessment process is complete.***

PAMP informs RAID that it will respond to RAID's questions about the Synergy assessment, disclosure, and prior due diligence, but only after the "independent" process is completed. PAMP tells RAID that it views RAID as "interfering" in the process and provides limited information about the assessment only on condition that it be kept confidential or otherwise refuses to share information. [\[Back to top\]](#)

#### **11 June 2020**

***MMTC-PAMP briefly posts "Executive Summary on Independent Report on North Mara" on its website before taking it down within hours.***

The entry appears under press release and is dated 10 June 2020, but the link to the underlying PDF is initially missing. For a brief period on the same day, the link becomes live and the Synergy Executive Summary is available for download. After that, the public entry and link are removed from the webpage. [\[Back to top\]](#)



 **12 June 2020**

**LBMA reacts to news of LBMA Good Delivery listed Perth Mint's role in sourcing gold associated with human rights violations and environmental destruction in Papua New Guinea by announcing an Incident Review.** [\[Back to top\]](#)

 **16 June 2020**

**RAID writes to the LBMA asking about the status of the assessor's report and the PAMP/MMTC-PAMP Incident Review.**

RAID asks if the LBMA has received the Synergy report and for it to clarify what are the next steps in the PAMP/MMTC-PAMP Incident Review. RAID reminds the LBMA that RAID is yet to receive a response to its [23 April](#) letter concerning the Incident Review Process, past due diligence and documents on LBMA policy and governance; and is also awaiting the LBMA's formal response on action relating to the EY judgment.

LBMA responds on the same day to say that the [4 May](#) response from the LBMA was a formal response on EY. The LBMA does not respond on the PAMP/MMTC-PAMP Incident Review and assessment. RAID replies that the LBMA previously referred to a review of EY's systems and controls and asks for the outcomes to be made public. Once more, RAID asks for a response on issues put to the LBMA concerning the PAMP/MMTC-PAMP Incident Review.

**The LBMA says it has been following up with EY entities over due diligence and that it will report publicly on its wider auditor review.**

Again, on the same day, the LBMA informs RAID that the LBMA is "following up on the impact of the [EY] case and the due diligence and grievance processes at these firms... EY group, global, regional and more specially the entities in question" and that an LBMA responsible sourcing report in July will provide information on the auditor review.

**For the first time, the LBMA refers to receiving a report on North Mara from PAMP/MMTC-PAMP .**

In respect of the PAMP/MMTC-PAMP Incident Review, the LBMA confirms receiving "the MMTC-PAMP report" on 15 June, which the LBMA "will be reviewing... in light of the assessment by [S]ynergy." [\[Back to top\]](#)

 **17 June 2020**

**RAID again calls upon the LBMA to provide a full and public response on the implications of the EY judgment for the LBMA's supply chain auditing.**

**RAID seeks clarification over when the LBMA received Synergy's report, the next steps under the PAMP/MMTC-PAMP Incident Review and provision for the receipt of further information from RAID.**

RAID asks for confirmation of when the LBMA received the Synergy Global report and if it received the full report or just the summary. RAID also seeks confirmation that there will be an opportunity to provide further information under the PAMP/MMTC-PAMP Incident Review before the process is completed. [\[Back to top\]](#)

 **3 July 2020**

**RAID submits its analysis of the executive summary of Synergy's North Mara Gold Mine Assessment to the LBMA under the PAMP/MMTC-PAMP Incident Review.**

**Around the same time as RAID makes its submission to the LBMA, MMTC-PAMP posts a press release entitled "North Mara Gold Mine – Statement" on its website.**

In the statement, there are links to the executive summary and MMTC-PAMP's latest audited LBMA responsible sourcing compliance report. [\[Back to top\]](#)

 **6 July 2020**

*The LBMA acknowledges receipt of RAID's submission, undertaking to be in touch once it has reviewed the submission. [\[Back to top\]](#)*

 **7 July 2020**

*PAMP replies to RAID, reproducing the content of MMTC-PAMP's 3 July press release, but failing to answer RAID's detailed questions on past due diligence, previous site visits to the North Mara mine, consultation with affected stakeholders, and the suspension of trading. [\[Back to top\]](#)*

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