



FROM EXCLUSION TO CO-OWNERSHIP: ADDRESSING THE STRUCTURAL BARRIERS TO CITIZENS BENEFIT FROM SIERRA LEONE'S NATURAL RESOURCES

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NMJD
Network Movement for
Justice and Development



Women
on
Mining & Extractive.

A Study Report on

From Exclusion to Co-Ownership: Addressing the Structural Barriers to Citizens Benefit from Sierra Leone's Natural Resources

This Study was commissioned by

Network Movement for Justice and Development (NMJD)

and

Women on Mining and Extractives (WoME)

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Finally, we recognize the commitment of the research team and field enumerators whose hard work and dedication made this report possible.

LIST OF ACRONYMS

CBA	Cost-Benefit Analysis
CDA	Community Development Agreement
CDF	Community Development Fund
CSO	Civil Society Organization
CSR	Corporate Social Responsibility
ECOWAS	Economic Community of West African States
EPA	Environment Protection Agency
FGD	Focus Group Discussion
FPIC	Free, Prior and Informed Consent
GDP	Gross Domestic Product
IMF	International Monetary Fund
KII	Key Informant Interview
MMMR	Ministry of Mines and Mineral Resources
NMA	National Minerals Agency
NMJD	Network Movement for Justice and Development
SLMMDMC	Sierra Leone Mines and Minerals Development and Management Corporation
WoME	Women on Mining and Extractives

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ABOUT ORGANIZATIONS

Kimberley Process (KP)

The Kimberley Process is a global initiative that aims to prevent conflict diamonds from entering the mainstream rough diamond market. It brings together governments, civil society, and the diamond industry to promote ethical sourcing and trade transparency. The KP Certification Scheme ensures that participating countries only trade certified conflict-free diamonds. Its work supports peacebuilding and responsible resource governance in the diamond trade along the supply chain.

Network Movement for Justice and Development (NMJD)

NMJD is a Sierra Leonean civil society organization committed to promoting social justice, human rights, and sustainable development. It engages in advocacy, research, and grassroots mobilization to empower communities affected by especially natural resource extraction. NMJD plays a leading role in promoting transparency and accountability in the mining and extractives sector. The organization also supports democratic governance, environmental protection, legal empowerment and climate justice among other issues. NMJD is a member of the Kimberley Process Civil Society Coalition that 'defends the rights of communities affected by mining'.

Women on Mining and Extractives (WoME)

WoME is a women-led coalition in Sierra Leone working to amplify the voices of women in the extractives sector. It focuses on advocacy, policy engagement, and capacity building to promote gender justice and equity in natural resource governance. WoME works closely with communities to challenge exclusionary practices and ensure women's meaningful participation in mining decisions. The organization also supports livelihood and leadership development for women in mining-affected areas. WoME is a member of the Kimberley Process Civil Society Coalition that 'defends the rights of communities affected by mining'.

EXECUTIVE SUMMARY

This study assesses the feasibility of adopting a co-ownership model in Sierra Leone's extractive sector, where both the local communities, state and mining companies hold equity stakes in mining ventures. The research explores current benefit-sharing model under the 2022 Mines and Minerals Development Act (MMDA), analyzes regional and international best practices, and identifies institutional, legal, and socio-political factors influencing reform. It draws on field data collected from Kono, Port Loko, Moyamba, Bonthe, and Freetown, including community surveys, key informant interviews, and focus group discussions.

Findings reveal that while mechanisms like Community Development Funds (CDFs) and Corporate Social Responsibility (CSR) exist, they are inadequate, poorly implemented, lack transparency, and are not driven by community priorities. A significant 64% of respondents believe communities should have a direct stake in mining revenues, and 41.3% are dissatisfied with the current benefits received. However, communities face persistent challenges, including weak legal implementations, limited technical capacity, and centralized governance structures. Experiences from countries such as Ghana, Botswana, Uganda, and Zimbabwe provide valuable lessons from benefit sharing frameworks that can inform the design and implementation of a co-ownership model in Sierra Leone.

The report recommends legal amendments to formally recognize co-ownership, fiscal incentives to attract better investment, local content requirements, and capacity building for communities and institutions. It also calls for ring-fencing mining revenues, separating them from the Consolidated Fund and ensuring transparent governance of the Mineral Wealth Fund. If implemented, these reforms can foster inclusive, equitable, and sustainable natural resource management in Sierra Leone.

1. INTRODUCTION

1.1 Background to the Study

Mining activities in Sierra Leone began in the 1920s with the enactment of the country's first extractives legislation, the Minerals Act of 1927,¹ which laid the foundation for formal mineral exploration and extraction. Nearly a century later, active mining operations are still ongoing, with the country being richly endowed with a variety of minerals. These minerals include diamonds, rutile, bauxite, gold, iron ore, limonite, platinum, chromite, coltan, tantalite, columbite, and zircon, along with promising petroleum potential.²

The mining sector contributes significantly to the country's Gross Domestic Product (GDP) such as in 2021 when the sector accounted for 0.6 percent of GDP, 67 percent of export earnings, 4.1 percent of total government revenues, and 3 percent of national employment.³ Yet, the socio-economic benefits of large-scale mining to the majority of citizens particularly those in mining-affected communities remain blurry. Furthermore, the large-scale extractive sector has historically been dominated by foreign ownership and weak enforcement of laws, which often presents challenges in translating national revenue into meaningful development for local livelihoods.⁴

Despite the presence of legal frameworks such as the Mines and Minerals Development Act (2022), which are intended to guide resource governance, many mining-affected communities continue to face poverty, environmental degradation, and limited access to services. These communities often feel excluded from decision-making processes and disconnected from the benefits derived from the resources beneath their land. In many cases, the distribution of wealth generated from mining activities appears unequal, reinforcing power imbalances between companies, the state, and the communities which is most impacted by extraction.⁵

¹ The Sierra Leone Minerals Policy of 2018

² Sierra Leone Extractive Industries Transparency Initiative (SLEITI), *EITI Report 2019*

³ U.S. Department of Commerce, *Country Commercial Guide: Sierra Leone – Mining and Mineral Resources*, last updated April 17, 2024, accessed June 24, 2025, <https://www.trade.gov/country-commercial-guides/sierra-leone-mining-and-mineral-resources>

⁴ Fayiah, M., & Fayiah, M. S. (2024). Long and short term implications of mineral mining operations in Sierra Leone: A review. *Natural Resources Conservation and Research*, 7(1), 4452.

⁵ Zanini, M. T. F., Migueles, C. P., Gambirage, C., & Silva, J. (2023). Barriers to local community participation in mining projects: The eroding role of power imbalance and information asymmetry. *Resources Policy*, 86, 104283.

While mining companies contribute to sub-national revenues and local development through Corporate Social Responsibility (CSR) projects and Community Development Agreements (CDAs), which under the Mines and Minerals Development Act (2022) require companies to allocate at least 1% of their gross annual revenues to affected communities,⁶ these mechanisms often fall short in terms of sustainability, equity, and long-term empowerment. CSR activities are often short-term and discretionary, with limited community involvement or ownership.⁷ Although CDAs are more structured, they often suffer from weak implementation and poor oversight. Moreover, trust in both mining companies and government institutions remains low and communities perceive a pattern of unfulfilled promises, poor transparency, and limited accountability.⁸

And with growing momentum from Civil Society Organizations (CSOs) and affected communities pushing for a more inclusive governance model that recognizes communities as co-owners of the resources extracted from their land and not just passive beneficiaries; this study aims to investigate the structural barriers (legal, policy, and socio-economic) that continue to exclude citizens from meaningful benefit, while exploring alternative models such as “co-ownership”.

1.2 Alignment with the Bassam Declaration

The Grand Bassam Declaration, adopted in April 2024 by West Africa Kimberley Process Regional Civil Society, calls for a rethinking of how natural resources are governed across West Africa. It emphasizes the importance of moving from mere benefit-sharing to co-ownership, ensuring that communities are not only passive recipients but active rights-holders in the management and utilization of natural resources. The Declaration was born out of growing frustrations over persistent inequalities, environmental harm, and the marginalization of communities in resource-rich areas.⁹

Key principles outlined in the Declaration include legal reforms that recognize community ownership rights, full and informed participation in decision-making processes, transparency in resource contracts and revenues, and mechanisms to ensure environmental and social

⁶ The Mines and Minerals Development Act of 2022

⁷ Marah-Jones, J. (2023). Exposing the real ‘social’ side of mining-related CSR in Sierra Leone. *The Extractive Industries and Society*, 15, 101315.

⁸ Pijpers, R. J. (2024). *Mining and Development in Sierra Leone: Negotiating Change and Navigating Uncertainty*. Taylor & Francis.

⁹ West Africa Kimberley Process Regional Civil Society: *The Grand-Bassam Declaration*, accessed July 1, 2025, <https://www.nmjdsi.org/wp-content/uploads/2024/05/Grand-Bassam-Declaration-final-MRU-KPCSC-2024.pdf>

accountability. It further highlights the urgent need to dismantle structural barriers that prevent communities from accessing justice when their rights are violated. The Declaration also stresses the responsibility of states to create an enabling civic space where civil society can monitor, advocate, and hold both companies and governments accountable. It also advocates for policy and advocacy strategies to secure land and mineral rights for communities, with emphasis on gender inclusion and intergenerational equity.

This study aligns closely with the aspirations of the Bassam Declaration. It seeks to investigate the extent to which Sierra Leone's current legal and policy frameworks reflect these principles and how they can be reformed to better serve the interests of mining-affected communities. By identifying gaps between policy rhetoric and lived community realities, the research provides a grounded perspective on what reforms are most urgently needed. The study also aims to contribute to regional discourse and advocacy by providing evidence from Sierra Leone's experience that can inform broader efforts in the Mano River Union, ECOWAS and beyond.

Moreover, by focusing on co-ownership as a governance model, the research supports the Declaration's vision of transforming communities from vulnerable stakeholders into empowered co-managers of the resources upon which their livelihoods depend. This approach not only redistributes economic benefits but also reshapes power relations, giving communities a stronger voice and stake in governance. Ultimately, the alignment between this study and the Grande Bassam Declaration underscores the growing consensus that sustainable resource governance in West Africa requires a paradigm shift towards equity, justice, and shared ownership.

1.3 Understanding the Concept of Co-Ownership in Natural Resource Governance

Co-ownership in the context of natural resource governance in this research refers to a governance model where local communities, the state, and mining companies share legally recognized roles in the ownership, management, and benefit of natural resources. It goes beyond traditional CSR, CDFs or conventional benefit-sharing approaches, co-ownership involves a more equitable and institutionalized form of participation, including possible equity stakes, joint management structures, or revenue-sharing agreements protected by law.¹⁰

¹⁰ Kung et al. (2022). Indigenous co-ownership of mining projects: A preliminary framework for the critical examination of equity participation. *Journal of Energy & Natural Resources Law*, 40(4), 413–435.

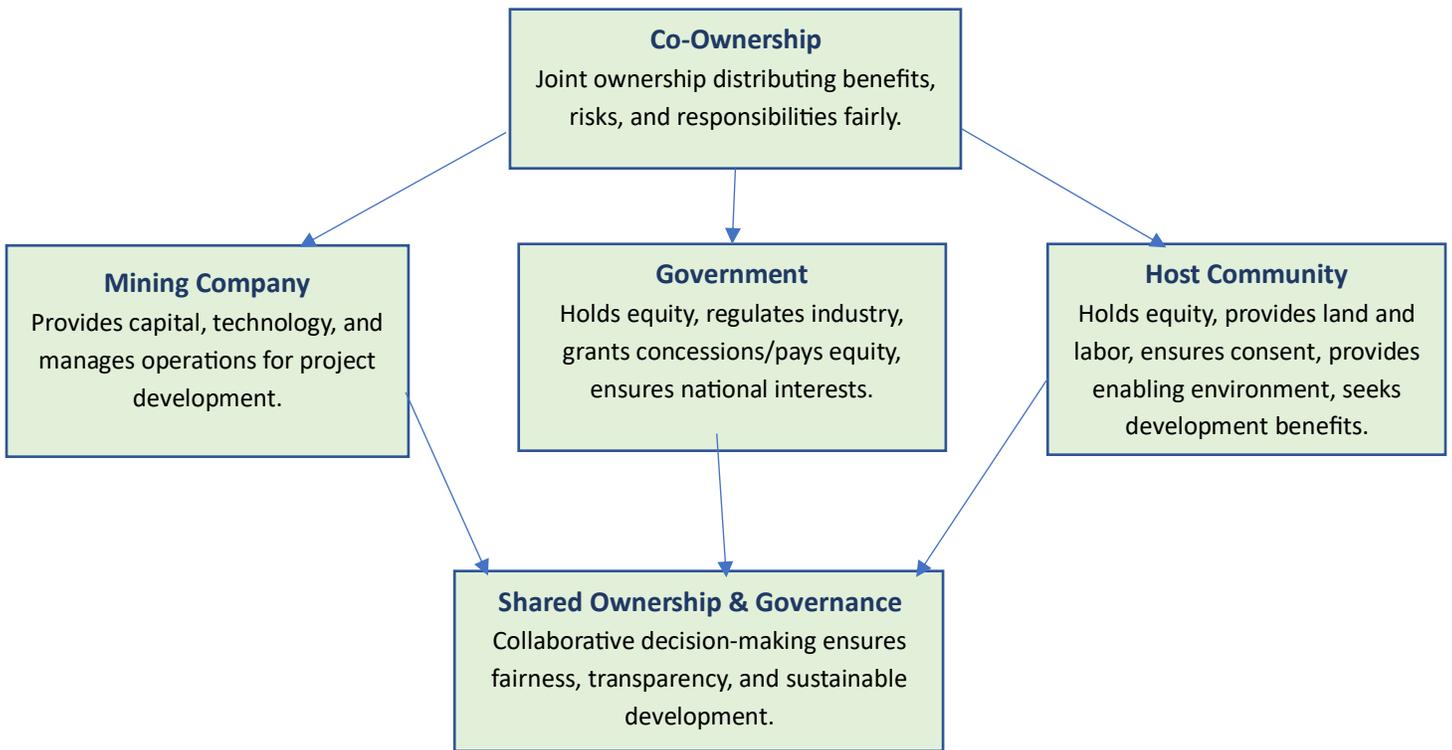


Figure 1.1: Co-Ownership Model

The Sierra Leone 2022 Mines and Minerals Development Act provides for limited community benefits through CSR and CDF; however, their implementation is often not community-driven and lacks meaningful community involvement, which undermines accountability and long-term impact.¹¹ This current model has largely failed to reduce poverty, with many mining-affected communities still lacking basic services, infrastructure and employment opportunities. It has also done little to empower communities or give them a real voice in decision-making.¹² Co-ownership offers a shift to a rights-based approach and human security framework where communities have enforceable stakes, responsibilities, and long-term benefits. This model also creates shared accountability among government, companies, and communities, ensuring that risks and rewards are more fairly distributed.

¹¹ Wilson, S. A. (2022). Measuring the effectiveness of corporate social responsibility initiatives in diamond mining areas of Sierra Leone. *Resources Policy*, 77, 102651.

¹² The Times SL. (26 April, 2025). *Mining Laws Enable Resource Looting*. [https://thetimes-sierraleone.com/plunder-by-law/#:~:text=%E2%80%9CThe%202022%20Act%20was%20a%20missed%20opportunity,Extractives%20\(NACE\)%2C%20and%20enforcement%20mechanisms%20remain%20hollow.](https://thetimes-sierraleone.com/plunder-by-law/#:~:text=%E2%80%9CThe%202022%20Act%20was%20a%20missed%20opportunity,Extractives%20(NACE)%2C%20and%20enforcement%20mechanisms%20remain%20hollow.) (Accessed July 4, 2025).

Key Differences Between Sierra Leone's Current Revenue-Sharing Model and the Proposed Co-Ownership Framework

ASPECT	SIERRA LEONE'S CURRENT REVENUE-SHARING MODEL	PROPOSED CO-OWNERSHIP MODEL
Nature of Benefit	Mining companies own ventures and pay taxes to government, with CSR and 1% CDF to communities.	Mining companies, government, and communities hold legal equity stakes in ventures, sharing both ownership and decision-making power.
Decision-Making Power	Communities have no role in company governance; decisions are company-driven and government-regulated.	Communities and government gain board representation, giving them a direct say in operations, spending, and social/environmental decisions.
Sustainability	Creates dependency on fixed revenue transfers (1%), taxes and vulnerable to mine closure for the community.	Equity shares create long-term wealth, reinvestment in local economies, and intergenerational benefits beyond mining life cycles.
Transparency and Accountability	Limited community oversight on how CDF funds are calculated, transferred and spent; communities often lack clarity on company finances.	Co-ownership requires regular financial disclosure, audited statements and community representation on boards, ensuring open access to revenue and cost data.

While Sierra Leone's mining laws provide for community consultation and require companies to obtain consent before operations begin,¹³ there is currently no legal framework that guarantees communities or the government an equity stake in mining ventures. For example, the Mines and Minerals Development Act (2022), Section 140 requires companies to negotiate Community Development Agreements (CDAs) with affected communities, but these are limited to social projects such as schools, health facilities, or livelihood support. As such, communities often play a peripheral role in decision-making and benefit-sharing. This research aims to explore what a co-ownership model could realistically look like in Sierra Leone's context, taking into account legal feasibility, economic implications, and socio-political dynamics.

¹³ ESG Investor. (18 August, 2022). *Sierra Leone Mining Law Requires Community Consent*. <https://www.esginvestor.net/live/sierra-leone-mining-law-requires-consent/> (Accessed June 28, 2025).

1.4 Relevance to Sierra Leone's Extractive Context

Sierra Leone's extractive sector continues to play a critical role in national development, contributing significantly to exports, revenue, and foreign investment. However, the distribution of mining benefits remains uneven, especially in host communities as they still face poverty, poor infrastructure, and weak access to social services.¹⁴

In 2024, the country recorded \$1.2 billion in mineral exports, with iron ore accounting for 70% of this value. Despite this impressive output, government revenue from royalties and taxes amounted to only around \$58 million (4.83%), raising concerns about benefit-sharing and fiscal justice. These disparities underscore the urgency of reforming governance frameworks to ensure resource wealth translates into tangible community benefits.¹⁵

The establishment of the Sierra Leone Mines and Minerals Development and Management Corporation (SLMMDMC) in 2023 marks a significant step in asserting national control over mineral wealth. The Corporation is mandated to manage mineral resources, negotiate deals, and oversee the Mineral Wealth Fund, which is fully state-owned.¹⁶ This development signals a shift toward state-led participation in mining projects. However, while this increases national ownership, local communities which are the people most affected by extraction remain largely outside formal benefit-sharing structures. Co-ownership could complement the Corporation's mandate by embedding community equity and participation at the local level.

The relevance of this research lies in its potential to inform legal and policy shifts that embed community co-ownership within Sierra Leone's mineral governance framework. Such arrangements, backed by appropriate reforms, can strengthen transparency, reduce conflicts, and enhance accountability in the extractive sector. Moreover, aligning such reforms with existing institutions like the SLMMDMC and the Mineral Wealth Fund can promote coherence in national and local benefit-sharing systems. Ultimately, empowering communities as partners, not just recipients, may help translate mineral wealth into lasting development outcomes.

¹⁴ Mutemer, N. (2024). *Mineral resource governance in Africa: A comparative study*. International IDEA. <https://www.idea.int/sites/default/files/2025-02/mineral-resource-governance-in-africa-a-comparative-study.pdf> (Accessed 5 July, 2025)

¹⁵ Sierra Leone Monitor. (2025, April 9). *Sierra Leone reports US \$1.2 billion in mining exports*. Sierra Leone Monitor. <https://www.sierraleonemonitor.com/sierra-leone-reports-1-2-billion-in-mining-exports/> (Accessed July 3, 2025)

¹⁶ Sierra Leone Mines and Minerals Development and Management Corporation. (n.d.). *Home*. <https://slmmdmc.gov.sl/> (Accessed July 3, 2025)

2. RESEARCH OBJECTIVES AND QUESTIONS

2.1 Research Objectives

- i. To analyze the legal and policy barriers preventing Sierra Leonean citizens from benefiting from the country's resources.
- ii. To examine the socio-economic impacts of extractive industries on communities.
- iii. To assess the historical trajectory of mineral exploitation and community exclusion.
- iv. To investigate the feasibility of a co-ownership model for citizens in the extractive sector.
- v. To contribute to regional advocacy efforts in line with the Grande Bassam Declaration.

2.2 Key Research Questions

To guide the study, the following key questions will be explored:

- i. What legal and policy gaps currently hinder community ownership and benefit in Sierra Leone's extractive sector?
- ii. How has the historical governance of natural resources contributed to community exclusion and underdevelopment?
- iii. What are the socio-economic impacts of mining activities on communities in selected districts?
- iv. How feasible is the implementation of a community co-ownership model in Sierra Leone's mining sector?
- v. What reforms are necessary to align the national resource governance framework with the principles of the Grande Bassam Declaration?

2.3 Expected Outcome

- i. Legal and Policy Recommendations aligned with the Grande Bassam Declaration to promote community co-ownership of resources.
- ii. Documentation of Socio-Economic Challenges faced by communities due to mining exclusion.
- iii. Framework for Strengthening Community Participation in the extractive sector.
- iv. Advocacy Strategy for pushing legal reforms in Sierra Leone, the Mano River Union region and ECOWAS.

3. SCOPE AND LEGAL CONTEXT OF THE STUDY

3.1 Thematic Scope

This study focuses exclusively on large-scale mining operations in Sierra Leone, with emphasis on key minerals such as diamonds, gold, bauxite, rutile, and iron ore. The decision to focus on large-scale mining stems from its wider environmental and social footprint, and the fact that communities are often less involved as co-owners or decision-makers in such projects.¹⁷ The study explores the historical and institutional governance of the sector, alongside its socio-economic impacts on livelihoods, land use, displacement, and access to public services. It also evaluates how governance practices have evolved and how community participation is shaped. Artisanal and small-scale mining are excluded to maintain focus on the systemic and structural dynamics of industrial-scale extraction.

3.2 Geographic Scope

The study was conducted in four districts representing Sierra Leone's major regions: Kono District (Eastern Province), Port Loko District (Northern Province), Bonthé and Moyamba Districts (Southern Province), and Western Area. These locations were selected to ensure regional representation, reflect diverse experiences with large-scale mining operations, and capture varying socio-economic and environmental impacts across the country.

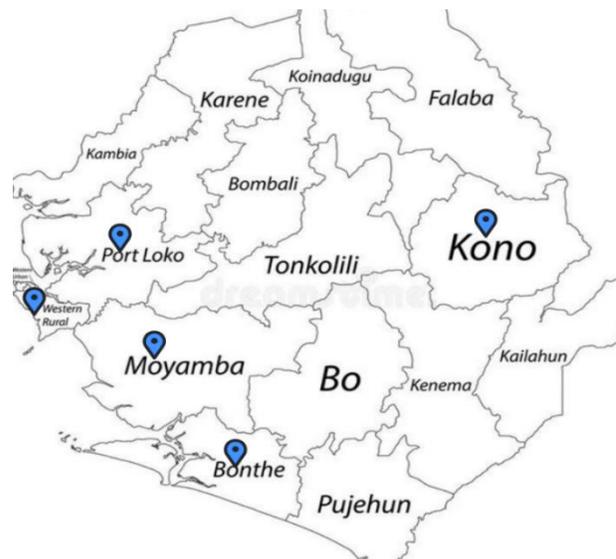


Figure 3.1: Research geographical scope

¹⁷ Mabey, P. T., Li, W., Sundufu, A. J., & Lashari, A. H. (2020). Environmental impacts: Local perspectives of selected mining edge communities in Sierra Leone. *Sustainability*, 12(14), 5525. <https://doi.org/10.3390/su12145525>

3.3 Key Stakeholders and Sectors

The research engaged a range of sectors and stakeholders involved in or impacted by the extractive industry. These include: (1) mining-affected communities, Community Development Committees (CDCs), and local/traditional leaders; (2) Civil Society Organizations active in the extractive sector; (3) government institutions such as the Ministry of Local Government and Community Affairs, the National Minerals Agency (NMA), and the Environmental Protection Agency (EPA); (4) the Sierra Leone Chamber of Mines, which represents mining companies; and (5) legal experts, academics, and policymakers. These diverse perspectives provide a holistic understanding of the challenges and opportunities for reform in the governance of natural resources.

3.4 Overview of Sierra Leone Legal and Policy Framework

3.4.1 Key Governance Institutions

- ✚ **Ministry of Mines and Mineral Resources (MMMMR):** Develops national mining acts, oversees sector strategy, and supervises key agencies.
- ✚ **National Minerals Agency (NMA):** The primary regulator of mineral resources, tasked with issuing mining licenses, ensuring compliance with mining laws, and monitoring sector performance.
- ✚ **Parliamentary Committee on Mines and Minerals:** Provides legislative oversight on mining operations and policies, including scrutiny of contracts and legal reforms.
- ✚ **Environmental Protection Agency (EPA):** Responsible for regulating and monitoring the environmental impacts of mining activities, including the issuance of Environmental Impact Assessment (EIA) licenses.
- ✚ **The Sierra Leone Mines and Minerals Development and Management Corporation (SLMMDMC):** A state-owned entity to negotiate deals, and manage the Mineral Wealth Fund on behalf of the public.
- ✚ **Sierra Leone Extractive Industries Transparency Initiative (SLEITI):** Ensures transparency and accountability in the management of revenues from extractives, in line with international EITI standards.

3.4.2 Relevant Legal Instruments

Sierra Leone's legal and policy framework governing the extractive sector comprises a mix of constitutional provisions, sector-specific laws and regulations, institutional mandates, and national policies. Notably:

- ✦ **Section 7 of the 1991 Constitution:** Mandates the state to harness natural resources for the benefit of all citizens, forming the foundational principle for equitable resource governance.
- ✦ **The Mines and Minerals Development Act (2022):** Serves as the principal legislation for regulating mining, license issuance, community development agreements, and benefit-sharing mechanisms.
- ✦ **The Sierra Leone Minerals Policy:** Outlines national goals for mineral resource management, including sustainability, value addition, and local content promotion.
- ✦ **The Artisanal Mining Policy:** Provides guidance for the regulation, formalization, and support of small-scale and artisanal miners.
- ✦ **The Geological Survey Report (2021):** Supports exploration and data-driven investment by providing updated geological information on mineral reserves across the country.
- ✦ **The National Minerals Agency Act:** Establishes the NMA as the technical regulator of the sector, responsible for license administration, monitoring, and compliance enforcement.
- ✦ **The Environmental Protection Agency Act:** Sets standards for environmental management and impact assessments in mining operations, aiming to mitigate ecological harm.
- ✦ **The Sierra Leone Mines and Minerals Development and Management Corporation Act (2023)** establishes a state-owned entity to hold equity in mining ventures, negotiate deals, and manage the Mineral Wealth Fund on behalf of the public.

4. METHODOLOGY

4.1 Research Design

This study adopted a mixed-methods research design, integrating both qualitative and quantitative approaches to provide a comprehensive analysis of the barriers to citizen benefit in Sierra Leone's extractive sector and feasibility for co-ownership. The combination of qualitative insights and quantitative data will enable a deeper understanding of the legal, historical, and

socio-economic dynamics at play.¹⁸ This design is well-suited for triangulating perspectives from communities, policymakers, and industry actors, and for drawing evidence-based conclusions that inform actionable reforms.

4.2 Data Collection Methods

The study employed four primary data collection methods to ensure diversity and reliability of information, particularly in understanding the dynamics and feasibility of community co-ownership in Sierra Leone's extractive sector.

- ✚ **Document and Policy Review:** A comprehensive desk review was carried out on existing laws, mining policies, historical records, government and NGO reports, and international frameworks such as the Grande Bassam Declaration. This helped trace the evolution of governance structures and identify gaps relevant to legal recognition of co-ownership models.
- ✚ **Focus Group Discussions (FGDs):** FGDs were held with traditional leaders, local CSOs, and women and youth groups in mining-affected communities. These discussions explored perceptions of ownership, participation, equity, and community recommendations for inclusive resource governance.
- ✚ **Key Informant Interviews (KIIs):** Semi-structured interviews were conducted with governmental institutions and ministries, CDCs, legal experts, mining companies, and CSOs. The interviews offered in-depth insights into existing institutional challenges, legal constraints, and the prospects of formalizing co-ownership in the sector.
- ✚ **Community Surveys:** Structured questionnaires were administered across the four selected districts. These surveys gathered quantitative data on citizens' awareness of their rights, economic impact of mining, experiences with community participation, and support for co-ownership reforms.

4.3 Sampling Strategy and Population

The target population included locals in mining-affected areas, CDCs, local leaders, CSOs, government institutions and ministries, legal experts, and mining companies. A purposive sampling method was used to select participants for KIIs and FGDs based on relevance and

¹⁸ Schoonenboom, J. (2023). The fundamental difference between qualitative and quantitative data in mixed methods research. In *Forum Qualitative Sozialforschung/Forum: Qualitative Social Research* (Vol. 24, No. 1).

expertise.¹⁹ For the surveys, stratified random sampling was applied within each district to ensure gender and age representation.²⁰ The sample include:

- ✚ 300 survey respondents (100 respondents each from Kono, Port Loko/Bonthe & Moyamba Districts).
- ✚ 8 FGDs (2 per the 4 region).
- ✚ 26 Key Informant Interviews across national and local levels.

4.4 Data Analysis Approach

Quantitative data from the community surveys was analyzed using statistical software such as SPSS and Excel. Descriptive statistics was used to summarize trends, while cross-tabulations was applied to compare district-level responses. Qualitative data from FGDs and KIIs was analyzed using thematic analysis.

4.5 Validation and Feedback Mechanisms

Validation was conducted and feedback derived through community sessions to confirm that findings reflected local realities. Expert reviews ensured accuracy and alignment with policy frameworks like the Grande Bassam Declaration. Data triangulation helped verify information from surveys, interviews, FGDs, and documents.²¹ All feedback was carefully documented and suggestions were integrated into the final report. This process strengthened the credibility and inclusiveness of the research, especially around the co-ownership model.

5. RESEARCH FINDINGS AND ANALYSIS

5.1 Demographic Analysis

The demographic data of the survey respondents in Table 5.1 indicates that most respondents were female (57.7%) and aged between 35 and 54 years (30.0%), representing the core working-age group. Over half were married (55.7%). Majority of the respondents had some formal education, with only 7.3% that had no formal education. Traders/business people (44.7%)

¹⁹ Campbell, S., Greenwood, M., Prior, S., Shearer, T., Walkem, K., Young, S., ... & Walker, K. (2020). Purposive sampling: complex or simple? Research case examples. *Journal of research in Nursing*, 25(8), 652-661.

²⁰ Zaman, T., & Bulut, H. (2023). Robust calibration for estimating the population mean using stratified random sampling. *Scientia Iranica*.

²¹ Bans-Akutey, A., & Tiimub, B. M. (2021). Triangulation in research. *Academia Letters*, 2(3392), 1-7.

dominated the occupational group, followed by miners and farmers. These profiles reflect communities actively engaged in livelihoods affected by large-scale mining.

Questions		Frequency	Percent
Gender of Respondents	Male	127	42.3%
	Female	173	57.7%
	Total	300	100.0
Age of Respondents	18-24	13	4.3%
	25-34	63	21.0%
	35-44	90	30.0%
	45-54	67	22.3%
	55 and above	67	22.3%
	Total	300	100.0
Marital Status	Single	36	12.0%
	Married	167	55.7%
	Divorce	43	14.3%
	Widow/Widower	54	18.0%
	Total	300	100.0
Highest Level of Education	No formal education	22	7.3%
	Primary school	85	28.3%
	Secondary school	73	24.3%
	Vocational/Technical training	83	27.7%
	Tertiary (college/university)	37	12.3%
	Total	300	100.0
Occupation of Respondents	Farmer	41	13.7%
	Miner	42	14.0%
	Trader/Business	134	44.7%
	Civil servant	21	7.0%
	Student	22	7.3%
	Unemployed	40	13.3%
	Other (please specify)	41	13.7%
	Total	300	100.0

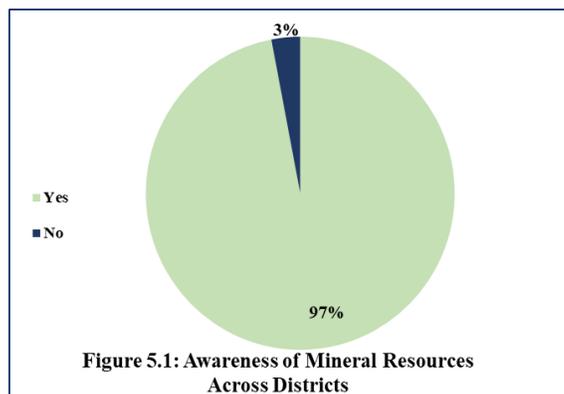
Table 5.1: Demography of Respondents

5.2 Awareness and Understanding of Resource Governance

This section explores the respondents' knowledge of the mining sector, relevant laws, and who they believe benefits most from extractive activities in their communities.

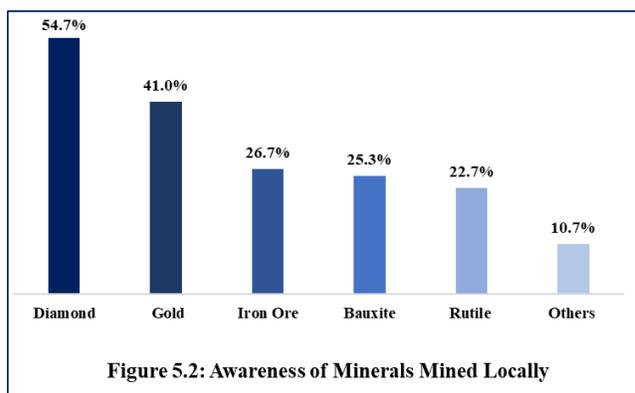
5.2.1 Awareness of Mineral Resources across Districts

Figure 5.1 reveals that an overwhelming 97% of respondents are aware that their district has mineral resources, indicating a high level of general awareness about the presence of extractive activities in their locality. Only 3% reported being unaware.



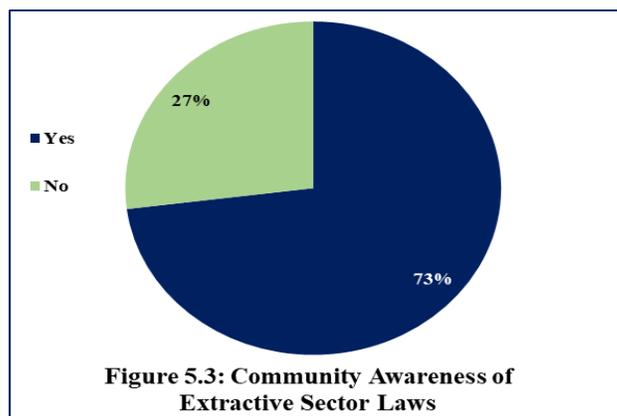
5.2.2 Awareness of Minerals Mined Locally

Figure 5.2 shows that 54.7% of respondents identified diamond as the most commonly mined mineral in their area, followed by gold at 41% and iron ore at 26.7%. Bauxite (25.3%) and rutile (22.7%) were less frequently mentioned. This suggests that community awareness is highest around more visible or historically dominant minerals.

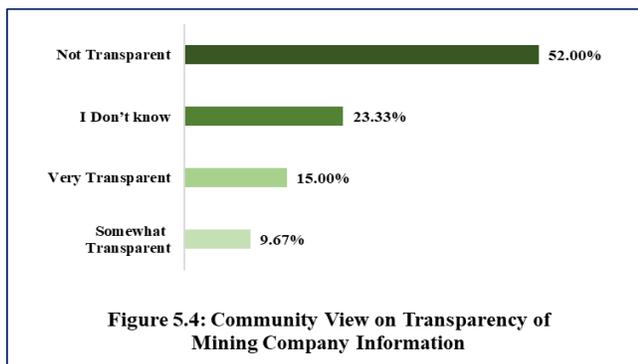


5.2.3 Community Awareness of Extractive Sector Laws

73% of respondents have received information about the laws governing the extractive sector, suggesting moderate legal awareness. However, 27% have not received such information, highlighting a gap in legal literacy and access to information.



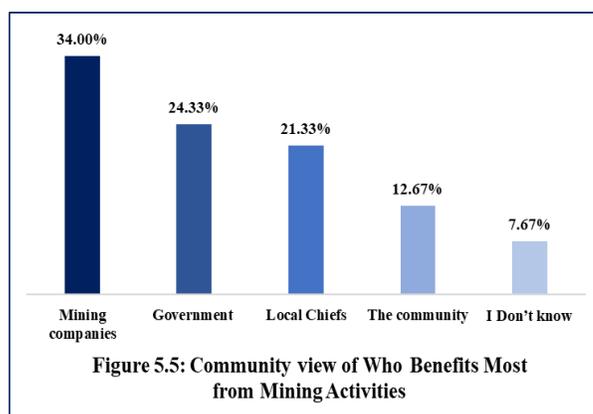
5.2.4 View on Transparency of Mining Company Information



52% of respondents believe mining companies are not transparent in sharing information with their communities, while only 15% consider them very transparent. The 23.33% who don't know suggests a lack of exposure or clarity, indicating weak information flow and accountability.

5.2.5 Community view of Who Benefits Most from Mining Activities

Figure 5.5 shows that 34% of respondents believe mining companies benefit the most from mining activities, followed by the government at 24.33%. Local chiefs are seen as beneficiaries by 21.33%, while only 12.67% feel their community gains the most, highlighting a perceived imbalance in benefit distribution.



5.2.6 FGDs and KIIs view on the Sierra Leone Resource Governance

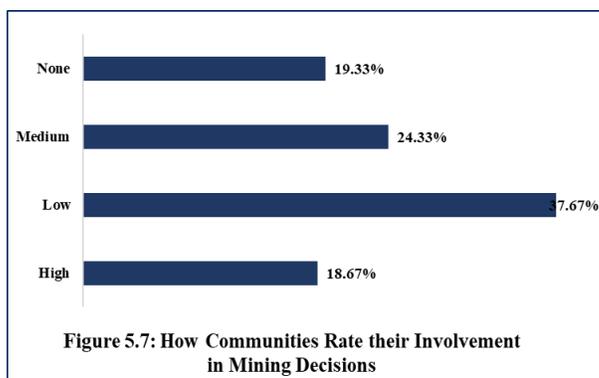
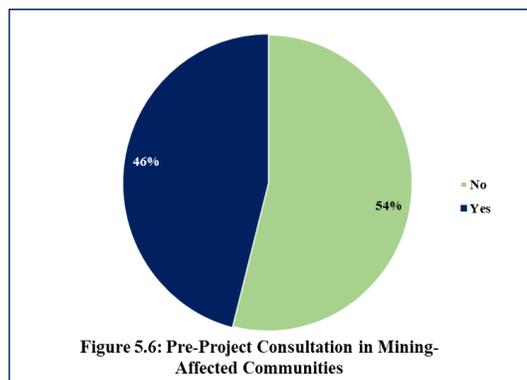
FGDs and KIIs reveal that Sierra Leone has a foundational natural resource governance structure involving institutions such as the Ministry of Mines and Mineral Resources, NMA, EPA, the Parliamentary Committee on Mines, etc. However, their coordination, accountability, and engagement with communities remain weak. Despite the presence of laws and policy frameworks, citizens are not well-informed about their rights due to limited sensitization, low literacy levels, and challenges in accessing and navigating online platforms like the NMA website and ResourceContracts.org. While Sierra Leone has taken important steps toward transparency such as publishing SLEITI reports, these often arrive late in the year, which slows down timely advocacy and citizen response. Participants emphasized that genuine transparency must be accessible, participatory, and supported by continuous community engagement. “The government says the laws are available online, but most people here don't know how to access them on the internet,” one participant noted.

5.3 Community Participation and Inclusion in Decision-Making

This section assesses the extent to which communities, including women and youth, are engaged in consultations and decision-making related to mining projects.

5.3.1 Pre-Project Consultation in Mining-Affected Communities

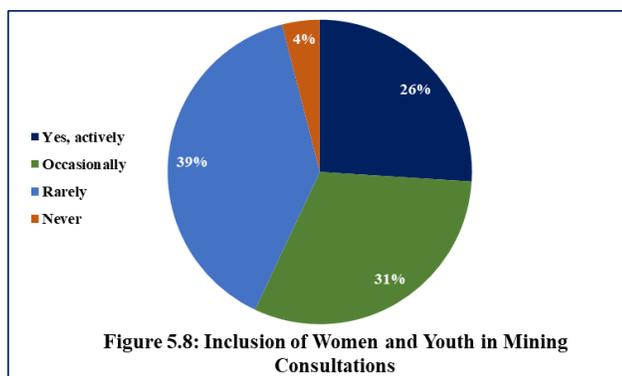
54% of respondents reported no consultation before mining projects began in their area, while 46% have experienced or know someone who was consulted. This indicates that community engagement prior to project initiation remains limited for many.



5.3.2 How Communities Rate their Involvement in Mining Decisions

Figure 5.7 shows that 37.67% of respondents rated community involvement in mining decisions as low, while 19.33% said there was none at all. Only 18.67% felt the involvement was high, suggesting that most communities perceive limited influence over mining-related decisions.

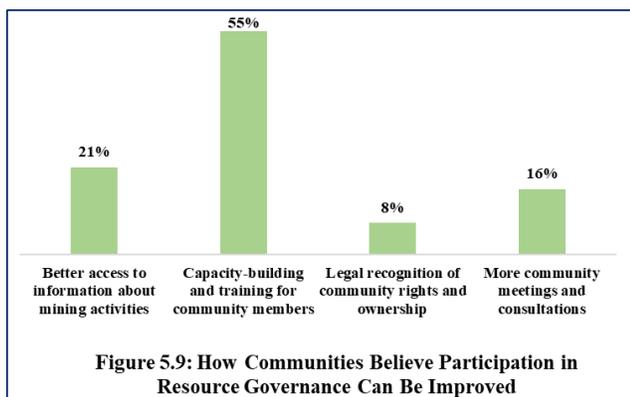
5.3.3 Inclusion of Women and Youth in Mining Consultations



Only 26% of respondents reported that women and youth are actively included in mining discussions, while 39% said their involvement is rare. This indicates that despite some participation, significant gaps remain in ensuring these groups are meaningfully consulted.

5.3.4 How Communities Believe Participation in Resource Governance Can Be Improved

The results reveal that a majority of respondents (55%) believe capacity-building and training are key to enhancing community participation in resource governance. Better access to information was also highlighted by 21%, while legal recognition of community rights received less emphasis at 8%. This suggests that empowering communities through skills development is seen as the most effective way forward.



5.3.5 FGDs and KIIs view on Community Participation and Inclusion in Decision-Making

FGDs and KIIs highlighted that both formal and informal mechanisms exist to promote community participation in natural resource decision-making. These include community consultations, the legal requirement for Free Prior and Informed Consent (FPIC), and the presence of Mines Complaint Officers etc.

However, in practice, these mechanisms often fall short of ensuring meaningful engagement, especially for women, youth, and marginalized groups. Key barriers identified include entrenched socio-cultural norms, patriarchal systems, and tokenistic forms of participation where community voices are heard but not acted upon. Many affected groups also lack a clear understanding of relevant laws and their responsibilities, which further limits their effective participation.

To improve inclusion, participants recommended strengthening the capacity and autonomy of District and Chiefdom Councils to lead community-level engagement. They also emphasized the need for independent and well-resourced grievance mechanisms at the local level, which communities can access safely and without fear of retaliation. Lastly, respondents called for CSOs to be legally involved throughout the decision-making process in the mining extractives.



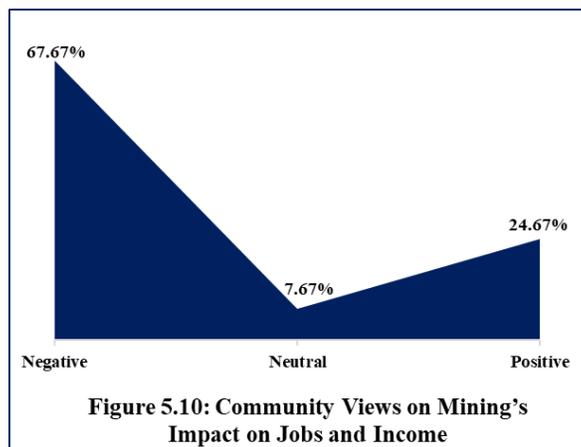
*Focus Group Discussion,
Moyamba District*

5.4 Socio-Economic Impact of the Extractive Sector

This section examines the perceived economic and social effects of mining on households, including income, displacement, and access to social services.

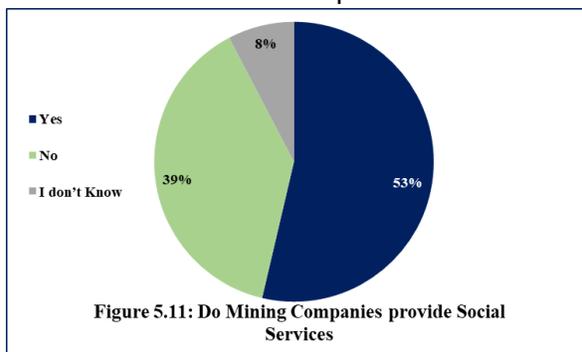
5.4.1 Community Views on Mining's Impact on Jobs and Income

Figure 5.10 reveals that the majority of respondents (67.67%) view mining as having a negative impact on their household income or job opportunities. Meanwhile, only 24.67% reported positive effects, and 7.67% felt neutral. This suggests that many communities feel mining has not translated into improved livelihoods for them.



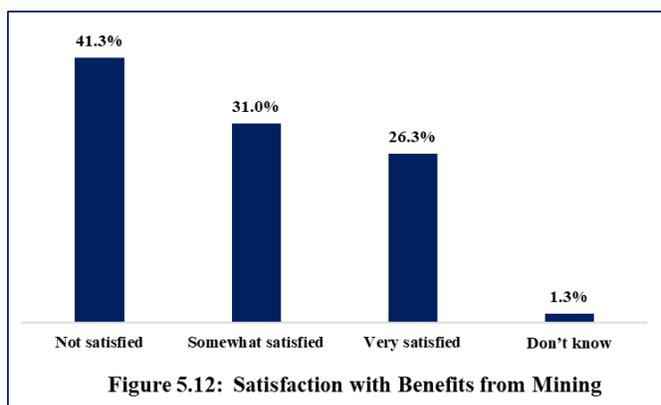
5.4.2 Do Mining Companies provide Social Services

Results show that 53% of respondents acknowledged that mining companies provide some form of social services in their area, such as schools, clinics, or roads. However, 39% said no, and 8% were unsure. This indicates a mixed perception and possibly inconsistent delivery or visibility of social investments across communities.

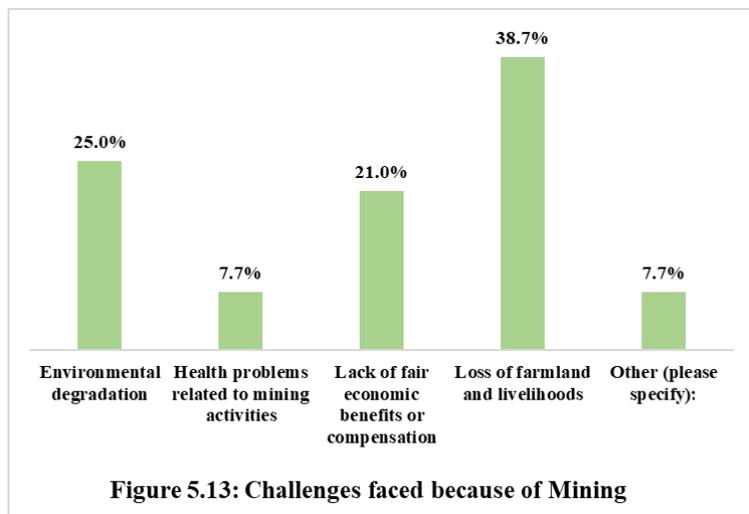


5.4.3 Satisfaction with Benefits from Mining

Figure 5.12 reveals that 41.3% of respondents are not satisfied with the benefits their community receives from mining, while 31% are only somewhat satisfied. Just 26.3% expressed strong satisfaction, suggesting a general sense of unmet expectations or perceived inequity in benefit distribution from mining operations.



5.4.4 Challenges faced because of Mining



The data shows that the most pressing challenge communities face due to mining is the loss of farmland and livelihoods (38.7%), followed by environmental degradation (25%) and lack of fair economic benefits or compensation (21%). Health issues and other concerns were mentioned less frequently (7.7% each), highlighting the centrality of land and income security in mining-affected areas.

5.4.5 FGDs and KIIs view on Socio-Economic Impact of the Extractive

FGDs and KIIs revealed that while mining brings some positive socio-economic benefits such as revenue generation, job creation, and basic infrastructure, these are often overshadowed by serious negative impacts. Communities frequently suffer displacement, loss of livelihoods, environmental degradation, and health risks, including increased cases of child labour and gender-based violence. A major concern is the poor handling of mine closures, which has left communities with open pits, no land for farming, and a return to poverty. Participants also criticized the weak implementation of Corporate Social Responsibility (CSR) and CDAs, noting that CDCs often fail to deliver tangible benefits. Most respondents felt beside the CDF, the national benefits or impacts of mining is difficult to track since they are channeled into the Consolidated Fund with limited transparency or direct community feedback. There was a general consensus that mining has many negative socio-economic effects than positives.



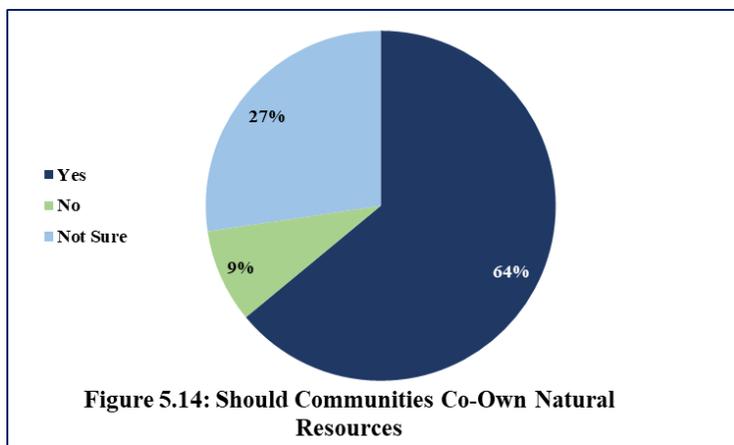
*KII interview with Edward B. Koroma,
Executive Director,
Transparency International*

5.5 Perceptions of Co-Ownership and Legal Reform

It captures community views on co-ownership of natural resources, support for legal reforms, and what mechanisms are needed to strengthen community involvement.

5.5.1 Should Communities Co-Own Natural Resources

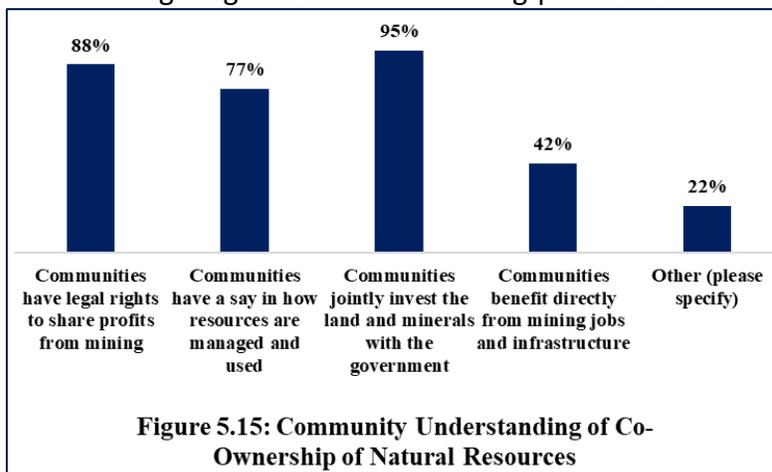
A strong majority of respondents (64%) believe that local communities should have co-ownership



of the natural resources mined in their area. However, 27.3% were unsure, indicating a potential gap in understanding or awareness of the concept, while only 8.7% outright disagreed. This suggests broad support for community involvement, but also highlights the need for more public education and dialogue on co-ownership frameworks.

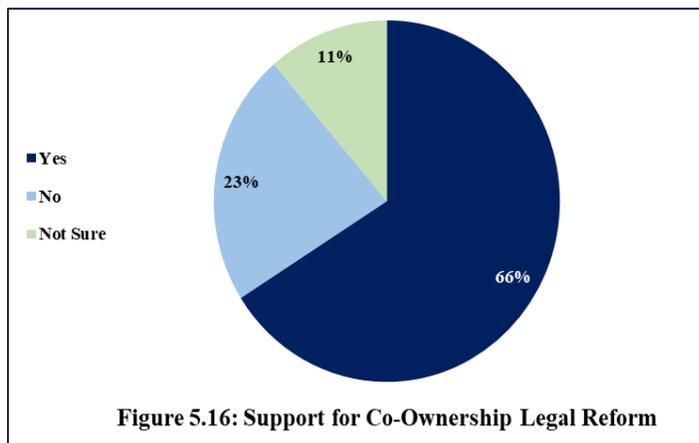
5.5.2 Community Understanding of Co-Ownership of Natural Resources

The majority (95%) of the respondents believe it means jointly investing land and minerals with the government, while 88% associate it with legal rights to share in mining profits. About 77% think it includes having a say in how resources are managed, and 42% view it as benefiting directly from jobs and infrastructure. Meanwhile, 22% offered other interpretations, suggesting a variety of expectations and definitions around co-ownership.



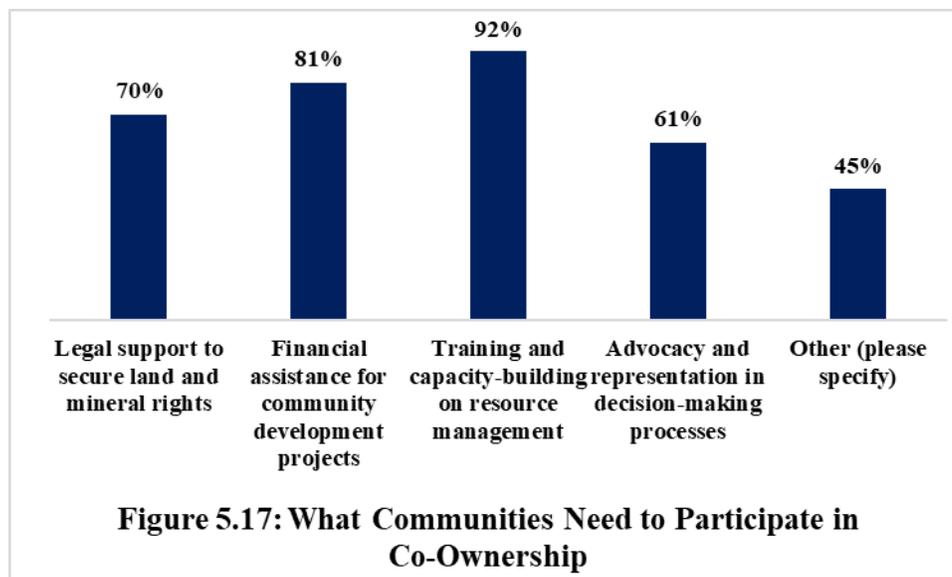
5.5.3 Support for Co-Ownership Legal Reform

The majority of respondents (66%) expressed support for a legal reform that formally recognizes co-ownership between communities/government and companies. About 23% were opposed, while 11% were uncertain. This indicates a strong public interest in more inclusive and equitable natural resource governance models.



5.5.4 What Communities Need to Participate in Co-Ownership

The most commonly identified form of support was training and capacity-building on resource management (92%), followed by financial assistance for community development projects (81%). Legal support to secure land and mineral rights was also significant (70%), as well as advocacy and representation in decision-making (61%). About 45% of respondents selected other forms of support, indicating a diverse range of community needs for effective co-ownership.



5.5.5 FGDs and KIIs Perceptions of Co-Ownership

Discussions with key informants and focus groups revealed broad support for the idea of co-ownership in the extractive sector, emphasizing that it should span the entire mining process,

from exploration to revenue distribution and not just profit-sharing. They noted that both the government and communities must be willing to invest or offer some incentives to secure equity, while also understanding the risks involved, including fluctuating market profits. Key legal reforms proposed include amending the Mines and Minerals Development Act to explicitly recognize community equity rights, and establishing clear, enforceable revenue-sharing frameworks. However, stakeholders cautioned that without proper structures for enforcement, even well-crafted laws may fall short in practice. There is also skepticism due to mutual mistrust between communities, companies, and the government.

Resistance to co-ownership is anticipated primarily from government as they focused on short-term development goals, who may be reluctant to wait for long-term returns from shared extraction ventures. Traditional leaders and local councils must be legally integrated into the governance process with clearly defined roles in oversight and benefit-sharing. Participants also stressed the importance of aligning Sierra Leone's policies with progressive commitments like the Grande Bassam Declaration, which provides strong frameworks for transparency and accountability. These commitments not only guide domestic legal reforms but also help drive political will, enhance regional consistency, and strengthen EITI implementation. Ultimately, these instruments must be used to move beyond symbolism and catalyze meaningful governance reform.

6. FEASIBILITY OF A CO-OWNERSHIP MODEL

6.1 Stakeholders Perspectives and Institutional Readiness

Stakeholder perspectives on co-ownership in Sierra Leone are complex and shaped by a mix of hope, caution, and realism. Many community members, CSOs, and some local authorities support the idea of co-ownership as a step toward correcting historic injustices and ensuring more direct benefits from mining. However, mining companies remain cautious, often citing legal uncertainty, political instability, and the lack of clear operational frameworks for shared equity models. Government ministries and agencies, while rhetorically supportive of community participation, often default to centralized control due to institutional inertia and limited capacity to manage decentralized arrangements effectively.

A key barrier to implementing a co-ownership model in Sierra Leone's mining sector is institutional readiness. While agencies like the MMMR, NMA, EPA and local councils exist in law,

their ability to coordinate, enforce, and support co-ownership is limited due to capacity gaps and fragmented mandates. For instance, the Mines and Minerals Development Act (2022), Section 6(1)(d) requires the Ministry to “publish an annual report on mineral activities... not later than 90 days after the end of each year”. Yet in practice, delayed publication undermines transparency efforts. Local councils and chiefdom authorities, though mandated by the Local Government Act to promote “productive activity and social development,” remain underfunded and lack a recognized voice in mining governance decisions. Without legal mechanisms to integrate these local bodies into co-ownership schemes, communities are relegated to consultation rather than having actual decision-making power.

External factors also complicate Sierra Leone's institutional readiness to implement a co-ownership model. International partners like the International Monetary Fund (IMF), World Bank, and other funders often attach conditions to loans that emphasize privatization, fiscal restraint, and reduced state participation in strategic sectors.²² While the IMF, World Bank, etc. does not explicitly prohibit government involvement in business, its economic policies can indirectly discourage models like co-ownership that require active state and community roles in managing natural resources. This presents a contradiction: on one hand, co-ownership requires stronger government leadership, equity stakes, and accountability structures; on the other, international financial frameworks tend to promote leaner government operations and favor private-sector dominance. Given Sierra Leone's heavy reliance on external loans and donor support, these competing priorities can make it difficult for policymakers to champion and implement co-ownership schemes without facing financial or political pressure.

Erosion of public trust in institutions poses a major barrier to implementing a co-ownership model in Sierra Leone's mining sector. Perceptions of corruption and selective enforcement of mining laws have weakened confidence in government-led initiatives.²³ Communities remain skeptical that they can participate meaningfully in mining governance without strong legal safeguards and robust capacity-building. For a co-ownership model to be viable, it must be underpinned by durable, bipartisan national commitment that extends beyond election cycles and donor agendas.

²² Biglaiser, G., & McGauvran, R. J. (2022). The effects of IMF loan conditions on poverty in the developing world. *Journal of international relations and development*, 25(3), 806.

²³ Bendu, F. S. (2023). *Stakeholder Participation, Institutional Arrangements in the Bauxite Mining Value Chain and Development in Mining Communities, Sierra Leone* (Doctoral dissertation, University of Cape Coast).

While interest in co-ownership is growing, the institutional frameworks in Sierra Leone are not yet fully equipped to support it. Persistent issues such as fragmented mandates, weak institutional coordination, limited local authority involvement, and external economic pressures all pose significant barriers. Restoring public trust and building institutional capacity are essential for meaningful progress. Co-ownership's success must be underpinned by comprehensive legal reforms, clear roles for all actors, sustained political commitment, and strong accountability mechanisms.

6.2 Community Aspirations and Power Dynamics

Tensions persist between traditional authorities and the broader community over who should have a say in mining-related decisions. Paramount chiefs and local leaders often act as intermediaries between companies and communities, frequently negotiating terms without broad-based consultation.²⁴ However, youth and women's groups are increasingly demanding inclusive engagement and shared decision-making structures. These groups argue that decisions affecting land, livelihoods, and local infrastructure must reflect the voices of those most impacted not just traditional leaders.

Institutional and political dynamics further complicate the feasibility of co-ownership. While Sierra Leone's democratic system allows for civic participation, frequent political transitions every five to ten years often result in inconsistent mining policies. These shifts reduce investor confidence and erode public trust in long-term government commitments. In addition, financial and regulatory authority remains centralized in Freetown, sidelining local government and grassroots actors.

Despite growing enthusiasm for co-ownership models, limited legal and financial literacy poses a significant barrier to effective community participation. Many community members struggle to understand complex issues such as equity distribution, company governance, or dividend-sharing mechanisms. This knowledge gap risks creating unequal partnerships and dependency, rather than genuine empowerment.

6.3 Lessons from Regional Resource Governance Models

Across Africa, several countries have made strides in reforming natural resource governance to promote community participation, transparency, and fairer benefit-sharing. Ghana, for example,

²⁴ Ubink, J., & Pickering, J. (2024). The mine, the community, and the chief—mining governance and community representation in conditions of legal pluralism. *Legal Pluralism and Critical Social Analysis*, 56(2), 236-264.

has established the Minerals Income Investment Fund (MIIF), which manages mining royalties and invests them strategically, with a portion earmarked for community development. This model helps ensure that revenues are not only captured by the central government but reinvested in long-term national and local development.²⁵ Similarly, in Burkina Faso and Mali, legal frameworks require mining companies to pay a percentage of profits directly into community development funds, which are jointly managed by local authorities, civil society, and state representatives.

In contrast, while Sierra Leone has taken a notable step with the creation of the SLMMDMC in 2023 to oversee the Mineral Wealth Fund, these reforms primarily strengthen the state's role in accessing and investing mining revenues. Governance remains highly centralized, with most payments still directed into the Consolidated Revenue Fund. The framework does not yet create space for communities to hold equity stakes, participate in governance, or share directly in the benefits of production. Instead, the model reinforces government ownership and oversight, leaving communities as passive recipients rather than co-owners in decision-making and value creation.

Botswana's Mines and Minerals Act (1999) allows the government to acquire a 15% stake in any licensed mining project. A proposed amendment in 2024 would require companies, if the government declines this option, to sell a 24% stake to citizens or citizen-owned businesses. The government through the state-owned Minerals Development Company already holds equity stakes in Debswana Diamond Company (50%), De Beers (15%), Morupule Coal Mine (100%).²⁶ In Zimbabwe, the Indigenization and Economic Empowerment Act of 2018 mandates co-ownership in platinum and diamond mining. In these two industries, at least 51% must be owned by the State through entities such as the Zimbabwe Mining Development Corporation, Zimbabwe Consolidated Diamond Company, or the National Indigenization and Economic Empowerment Fund.²⁷ While Uganda through the Mining and Minerals Act 2022 also established the Uganda National Mining Company (UNMC) a state-owned firm to hold a 15% government equity stake in

²⁵ Minerals Income Investment Fund. (n.d.). *About Us*. MIIF. Retrieved July 23, 2025, from Minerals Income Investment Fund website.

²⁶ Reuters. (18 June, 2024). *Botswana plans law to force mines to sell 24% stake to locals*. Mining Technology. <https://www.mining-technology.com/news/botswana-law-stake-locals/> (Accessed July 3, 2025).

²⁷ Indigenisation and Economic Empowerment Act of 2018. <https://zimlil.org/akn/zw/act/2007/14/eng@2018-03-14>

medium and large-scale mining projects.²⁸ While these initiatives are laudable, the ownership relationship is only between the State and Mining company. This arrangement begs the question “where are the communities”?

Overall, these regional approaches demonstrate that innovative revenue governance and partial forms of co-ownership are possible. However, they stop short of granting communities direct equity and decision-making power alongside government and companies. This is where Sierra Leone has an opportunity to go further by embedding communities not just as beneficiaries of funds, but as legal co-owners with enforceable rights and responsibilities. Such a model would position Sierra Leone as a pioneer in Africa, advancing beyond benefit-sharing and state-only ownership to genuine tripartite co-ownership.

6.4 Reform Opportunities and Implementation Pathways towards Co-Ownership

Sierra Leone has an opportunity to pursue meaningful reform in its natural resource governance by adopting a co-ownership model. The first opportunity lies in amending the Mines and Minerals Development Act to include legal provisions for co-ownership structures that explicitly recognize and protect both government and community equity stakes in mining operations. These provisions should also mandate that a defined portion of revenue be channeled into the Mineral Wealth Fund, with a legal requirement for transparent reinvestment into long-term, sustainable development projects at both national and community levels. This pathway provides the legal foundation necessary to institutionalize co-ownership as a viable and enforceable governance model.

Another critical pathway to making co-ownership is to enact legal provisions within the Mines and Minerals Development Act to mandate local content participation by requiring mining companies to allocate a defined percentage of their support services such as logistics, catering, transport, and maintenance, etc. to qualified local businesses. While Sierra Leone's existing Local Content Act encourages this practice, embedding it explicitly within the Mines and Minerals Development Act would provide stronger legal backing and enforceability within the mining sector. This pathway would ensure that mining operations contribute more directly to local economic development, contribute to small and medium enterprise growth, create jobs, and

²⁸ Mining Business Africa. *Uganda launches state-owned mining company*. <https://miningbusinessafrica.co.za/uganda-launches-state-owned-mining-company-2/> (Accessed June 12, 2025).

enhance the integration of host communities into mining value chains thereby making co-ownership more meaningful and inclusive.

District and Chiefdom Councils, relevant agencies, CSOs, and community representatives must be capacitated through technical training, legal literacy, and financial education to effectively represent local interests in resource negotiations and ensure meaningful participation in oversight processes from the national to the village level. Additionally, establishing independent, community-based grievance redress mechanisms that provide accessible and safe avenues for dispute resolution without fear of retaliation will enhance accountability and trust.

At the implementation level, pilot models of Public-Community-Private Partnerships (PCPPs) can be initiated in select mining regions. These would involve structured co-ownership arrangements where communities hold equity or profit shares in projects, supported by transparent governance boards including government, company, and community representatives. These pilots would offer learning opportunities, build trust among stakeholders, and inform national scale-up strategies. To make such models work, institutional reforms must be backed by investment in digital infrastructure, data accessibility, and capacity for negotiation and contract review, especially at the community level.

Frameworks such as the Grande Bassam Declaration, and EITI standards offer external reference points that can guide reforms and attract donor and private-sector support. Reform must also account for macroeconomic dynamics such as fluctuating mineral prices and fiscal pressures which necessitate flexible, revenue-buffering mechanisms like stabilization funds or sovereign wealth investments.

Sierra Leone stands at a crossroads. The transition to co-ownership requires more than legal reform; it demands a full institutional transformation rooted in transparency, inclusivity, and strong local participation. By starting with targeted pilots, amending laws for equity recognition, and investing in governance capacity, the country can lay the groundwork for a future where communities are not just affected by mining but actively benefiting from and shaping it.

7. RECOMMENDATIONS

7.1 For National Government Institutions

1. **Conduct a comprehensive and transparent Cost-Benefit Analysis (CBA).** This would assess the financial viability of co-ownership for all stakeholders, not just in terms of profit, but also

in relation to administrative costs, social equity, and long-term economic resilience. A CBA could help policymakers design a model that builds confidence, ensures fairness, and maximizes shared value for communities and the state.

2. **Legal Amendments to Support Co-Ownership.** Modify the Mines and Minerals Development Act and related laws to formally recognize community equity shares and co-ownership rights, including provisions for revenue sharing and joint decision-making.
3. **Develop a National Minerals Development Plan.** Formulate a comprehensive, long-term National Minerals Development Plan that unifies policy, governance, and investment strategies across the mining sector. This plan would provide continuity across government administrations, guide equitable resource allocation, clarify roles for all stakeholders including communities and serve as a reference framework for sustainable sector growth and co-ownership implementation.
4. **Establish Transparent Mineral Wealth Fund Management.** Strengthen governance of the Mineral Wealth Fund with clear legal mandates, independent oversight, and transparent reporting to ensure community benefits are properly managed and disbursed.
5. **Institutionalize Community Representation.** Create legal frameworks that require community representatives to have seats on boards overseeing mining revenues and wealth fund allocations, ensuring their voice in resource management.
6. **Mandate Local Content and Capacity Building.** Enforce laws requiring mining companies to subcontract local businesses and invest in community capacity building, supported by the Mineral Wealth Fund to promote sustainable socio-economic development.
7. **Separate Mining Revenues from the Consolidated Fund.** Establish a dedicated Natural Resource or Minerals Revenue Account outside of the Consolidated Fund to allow for clearer tracking, better accountability, and direct reinvestment in affected communities. This would enable citizens and stakeholders to trace how mining revenues are spent and ensure they contribute meaningfully to development.
8. **Introduce Fiscal Policies Favoring Co-Ownership.** The government should adopt fiscal policies such as tax incentives, equity-matching schemes, or capital gains exemptions that encourage sustained government and community investment in mining ventures. Unlike short-term royalties, equity offers communities a long-term stake in the sector's profitability, promoting wealth generation, accountability, and shared responsibility in resource governance.

7.2 For Mining Companies and Investors

1. **Support Co-Ownership Pilots.** Partner with government and communities to pilot co-ownership schemes that include clear frameworks for risk-sharing, equity participation, and transparent reporting.
2. **Comply with Local Content and Subcontracting Requirements.** Commit to sourcing services such as catering, transport, and maintenance etc. from local enterprises, helping to strengthen community economies.
3. **Invest in Community Capacity Building.** Fund technical training programs that prepare communities to engage in oversight, equity management, and environmental monitoring.
4. **Ensure Environmental and Social Accountability.** Adopt and disclose environmental, social, and governance (ESG) metrics that include community ownership indicators as part of regular reporting and audits.

7.3 For Local Communities and Traditional Leaders

1. **Strengthen Internal Governance Structures.** Develop transparent, inclusive community bodies (with youth, people with disability and women representation) to participate in negotiations and manage shared benefits.
2. **Demand Legal and Financial Literacy Training.** Work with civil society and partners to gain skills in interpreting contracts, understanding equity models, and managing mining-related revenues.
3. **Document and Advocate for Customary Land Rights.** Work to formalize community land ownership and tenure rights as a basis for negotiating co-ownership.
4. **Hold Leaders Accountable.** Set up community-based accountability systems to monitor how chiefs and local representatives engage with companies and handle benefits.

7.4 For Civil Society Organizations

1. **Facilitate Awareness and Dialogue on Co-Ownership.** Organize forums, media campaigns, and trainings to demystify co-ownership and advocate for its inclusion in national laws.
2. **Provide Technical Support and Legal Empowerment.** Assist communities in understanding legal agreements and navigating regulatory frameworks to safeguard their interests.
3. **Strengthen Regional Solidarity.** Build alliances with CSOs in other African countries advancing similar reforms, creating a network for sharing best practices and policy advocacy.
4. **Monitor and Publicize Company Conducts.** Act as watchdogs by independently monitoring mining operations, benefit-sharing, and environmental impacts.

5. **Champion Gender and Youth Inclusion.** Ensure that the co-ownership conversation includes women and young people, both as rights-holders and leaders.

7.5 For Donors and International Partners

1. **Align Funding with Inclusive Ownership Goals.** Prioritize financial and technical support for reforms that promote co-ownership, local equity stakes, and community empowerment.
2. **Support Policy and Legal Reform.** Provide expertise and funding to assist government and civil society in reviewing and amending mining legislation to enable co-ownership.
3. **Fund Capacity Development at All Levels.** Invest in long-term training programs for communities, local governments, and CSOs to meaningfully participate in governance and resource management.
4. **Encourage Transparency and Independent Oversight.** Promote tools such as public CBA reports, community scorecards, and independent audits to enhance trust in co-ownership models.

8. CONCLUSION

The current mining governance model in Sierra Leone, while legally evolving, remains heavily fragmented and insufficiently responsive to the needs and aspirations of communities. Despite formal structures such as CDF and recent institutional innovations like the SLMMDMC, communities continue to face systemic exclusion from decision-making and benefit-sharing processes. This has fueled distrust, weakened public oversight, and hindered the realization of inclusive, long-term development from the country's mineral wealth.

A co-ownership model offers a bold but necessary pathway to restructure the relationship between the state, mining companies, and communities. If implemented with transparency, legal clarity, and institutional support, co-ownership could enable mining communities to participate meaningfully in resource governance, share in the profits of extraction, and hold institutions accountable. It would also reposition mining as a driver of broad-based development rather than elite enrichment or community exploitation.

However, achieving this transformation will require far more than policy tweaks. It demands sustained political will, legal reforms, fiscal innovation, and capacity building at all levels; from ministries to communities. For Sierra Leone, the question is not whether co-ownership is desirable, but whether the state, private sector, and communities are ready to commit to the reforms that will make it work.

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ANNEXES

Annex 1: Survey Questionnaire

General Information and Consent

By: Network Movement for Justice and Development (NMJD) & Women on Mining and Extractives (WoME) with support from the Kimberley Process Civil Society Coalition (KPCS).

Title of Research: From Exclusion to Co-Ownership: Addressing the Structural Barriers to Citizen Benefit from Sierra Leone's Natural Resources

Research Purpose: This research aims to understand the barriers that prevent Sierra Leonean citizens from fully benefiting from the country's natural resources and to explore potential strategies for inclusive governance and community co-ownership.

Voluntary Participation: Your participation is entirely voluntary. You have the right to refuse to answer any question or stop participating at any time without any negative consequences.

Confidentiality:

All responses will be kept confidential and used solely for research purposes.

Duration: This survey will take approximately 15–20 minutes.

Consent Statement: By proceeding with this survey, you confirm that you understand the purpose of the study and consent to participate willingly. If you have any questions or concerns, please feel free to ask the data collector before beginning.

Demographic Information

1. **Age:**

18-24 25-34 35-44 45-54 55 and above

2. **Gender:**

Male Female

3. **Marital Status:**

Single Married Divorce Widow/Widower

4. **Highest Level of Education Completed:**

No formal education Primary school Secondary school
 Vocational/Technical training Tertiary (college/university)

5. **Occupation:**

- Farmer Miner Trader/Business Civil servant
 Student Unemployed Other (please specify): _____

6. **Community/Chieftom:** _____7. **District:**

- Kono Port Loko Bonthe/Moyamba Western Area

1. Awareness and Understanding of Natural Resource Governance

1. Are you aware that your district has mineral resources?

- Yes No

2. Which minerals do you know that are currently being mined in your community or district?

- Diamond Gold Bauxite Rutile Iron Ore Others

3. Have you ever received information about the laws regarding the extractive sector?

- Yes No

4. In your opinion, how would you rate the level of transparency in how mining companies share information (e.g., financials, environmental impact, community agreements) with your community?

- Very Transparent Somewhat Transparent Not Transparent I Don't know

5. Who do you believe benefits most from the mining activities in your community?

- Government Mining companies Local Chiefs
 The community Don't know

2. Community Participation and Inclusion in Decision-Making

6. Have you or anyone you know ever been consulted before a mining project started in your area?

- Yes No

7. How would you rate the level of community involvement in mining decisions?

- High Medium Low None

8. Are women and youth in your community included in mining discussions or consultations?

- Yes, actively Occasionally Rarely Never

9. What would you suggest to improve your community's participation in natural resource governance? (Select all that apply)

- More community meetings and consultations

- Better access to information about mining activities
- Legal recognition of community rights and ownership
- Capacity-building and training for community members
- Other (please specify): _____

3. Socio-Economic Impact of Extractive Activities

10. How would you describe the effect of mining on your household's income or job opportunities?
- Positive Neutral Negative
11. Do mining companies provide any social services (schools, clinics, roads, etc.) in your area?
- Yes No I Don't know
12. How satisfied are you with the benefits your community receives from mining?
- Very satisfied Somewhat satisfied Not satisfied Don't know
13. What are the biggest challenges your community faces because of mining?
- Environmental degradation (e.g., land, water pollution)
 - Loss of farmland and livelihoods
 - Health problems related to mining activities
 - Lack of fair economic benefits or compensation
 - Other (please specify): _____

4. Perceptions of Co-Ownership and Legal Reform

14. Do you believe local communities should have co-ownership of natural resources mined in their area?
- Yes No Not sure
15. In your view, what does co-ownership of natural resources involve? (Select all that apply)
- Communities have legal rights to share profits from mining
 - Communities have a say in how resources are managed and used
 - Communities jointly invest the land and minerals with the government
 - Communities benefit directly from mining jobs and infrastructure
 - Other (please specify): _____
16. Would you support a legal reform that formally recognises co-ownership between communities and the government or companies in the management and benefits of natural resources?
- Yes No Maybe

17. What forms of support would help your community participate more effectively in the co-ownership and management of its natural resources? (Select all that apply)

- Legal support to secure land and mineral rights
- Financial assistance for community development projects
- Training and capacity-building on resource management
- Advocacy and representation in decision-making processes
- Other (please specify): _____

Annex 2: Focus Group Discussion Guide

Community..... District..... Date.....

1. Awareness and Understanding of Natural Resource Governance

1. What do you understand by "natural resources" and who do you believe owns them in Sierra Leone?
2. Are you aware of any laws or policies that govern mining activities in your community? If yes, which ones?
3. How informed are people in this community about their rights regarding land and minerals?

2. Community Participation and Inclusion in Decision-Making

1. Do you feel that your views are considered by mining companies or government authorities? Why or why not?
2. What challenges or barriers prevent the community from fully participating in resource-related decision-making?
3. In what ways can the community participate in decisions related to mining?

3. Socio-Economic Impact of Extractive Activities

1. How has mining or resource extraction affected livelihoods in this community (positively or negatively)?
2. Have you seen any development (e.g., roads, schools, clinics) linked to the mining activities in your area?
3. What kind of compensation or support, if any, has the community received from companies or government?

4. Perceptions of Co-Ownership and Legal Reform

1. What does “co-ownership of natural resources” mean to you? Do you think it is possible here?
2. What changes would you like to see in laws or policies to ensure the community benefits more from natural resources?
3. Do you trust the government or companies to implement a co-ownership model fairly? What would make you trust them more?

Annex 3: Key Informants Interview Questionnaire

Name..... Position..... Date.....

1. Awareness and Understanding of Natural Resource Governance

1. How would you describe the current governance structure of Sierra Leone's natural resource sector?
2. What legal frameworks guide the allocation, use, and ownership of natural resources in Sierra Leone?
3. In your view, are citizens adequately informed about their rights and responsibilities regarding natural resources?
4. How transparent is information on mining contracts, revenues, and licensing to the public?

2. Community Participation and Inclusion in Decision-Making

1. What formal or informal mechanisms exist to ensure community participation in resource-related decision-making?
2. What are the major limitations or gaps in ensuring inclusive participation of women, youth, and marginalized groups?
3. What institutional reforms would you recommend to improve community inclusion in governance processes?

3. Socio-Economic Impact of Extractive Activities

1. From your assessment, what are the key social and economic impacts of mining on local communities?
2. How well are corporate social responsibility (CSR) or community development agreements (CDAs) being implemented?

3. In your opinion, do the positive contributions of the extractive sector (such as economic growth, job creation, and infrastructure) outweigh the negative impacts (such as environmental degradation, displacement, and social disruption)?

4. Perceptions of Co-Ownership and Legal Reform

1. What are your views on the idea of co-ownership of natural resources between the state/local communities and mining companies?
2. What legal or policy reforms are required to support community co-ownership in practice?
3. Do you foresee any resistance or risks in transitioning to a co-ownership model? If so, from whom and why?
4. How can traditional leaders and local governance structures be integrated into co-ownership models?
5. What role should Sierra Leone's international commitments (e.g., Bassam Declaration) play in informing domestic reforms?

Annex 4: List of Institutions/Positions interviewed as Key Informants

NO	INSTITUTION/POSITIONS
1	National Minerals Agency (NMA)
2	Ministry of Local Government and Community Affairs
3	Environment Protection Agency (EPA)
4	German Agency for International Cooperation (GIZ), Sierra Leone
5	Transparency International Sierra Leone
6	Sierra Leone Extractive Industries Transparency Initiative (SLEITI)
7	The Natural Resource Governance and Economic Justice (NaRGEJ -SL)
8	Women Alliance on Natural Resources Governance in Sierra Leone (WANrg-SL)
9	The Sierra Leone Chamber of Mines
10	Deputy Chief Administrator (DCA) - Moyamba District Council
11	Coordinator, Women's Initiative for Empowerment in Extractive (WIFEE)
12	Chairman, Benduma Farmers Based Organization, Bagruwa Chiefdom, Moyamba District.

13	Chairman, Bauxite Community Development Committee (CDC), Mosesie Junction, Moyamba District
14	Chairperson, Rutile Community Development Committee (CDC), Imperi Chiefdom, Bonthe
15	Section Chief, Ndendemoya Section, Moyamba District
16	Programme Coordinator, Network Movement for Justice and Development (NMJD), Kono
17	Koidu New Sembehun City Council
18	Executive Director, Advocate for Social Justice and Development (ASJD)
19	Community Development Committee (CDC), Gbense Chiefdom, Kono
20	Gbense Chiefdom Council
21	Community Development Committee (CDC), Tankoro Chiefdom
22	Town Chief, New Sembehun, Kono
23	Youth Leader, Tankoro Chiefdom
24	Town Chief, Lunsar, Port Loko
25	Chairman, Council of Headmen, PortLoko
26	Chairman, VIMETCO Bauxite, Community Development Committee (CDC)

Annex 5: Grande Bassam Declaration (Excerpts)

We, the member organizations of the Mano River Union Kimberley Process Civil Society Coalition, participating in a Regional Workshop held in Grand Bassam, Cote d'Ivoire, from 23 to 24 April 2024, deliberated on the impact of extractive activities on local communities in the region, analyzed the drivers of unacceptable consequences for communities, with a particular focus on the diamond sector. The meeting agreed on strong recommendations to ensure that mining takes a rights-based approach and that it is economically beneficial, socio-ecologically responsible, politically transparent and accountable, to ensure social justice and sustainable development. Specific attention was given to diamond mining.