

# **CIVIL SOCIETY NATIONWIDE CONSULTATIONS AND VALIDATION ON THE REVIEW OF KEY MINERAL SECTOR REGIMES IN SIERRA LEONE**

November – December 2025, Moriba Town, Bonthe District, Lunsar, Port Loko District Koidu, Kono District Stakeholder Validation Meeting - Freetown



## **Nationwide Consultation and Validation Report**

Prepared for and on behalf of Network Movement for Justice and Development (NMJD) by:  
Daniel Gbondo Esq., Independent Consultant

# Contents

<b>EXECUTIVE SUMMARY .....</b>	<b>2</b>
1. BACKGROUND.....	4
2. OBJECTIVES OF THE WORKSHOPS .....	6
3. WORKSHOP METHODOLOGY .....	6
4. KEY ISSUES IDENTIFIED BY COMMUNITIES.....	7
5. MAIN PRESENTATIONS .....	7
6. Conclusion.....	12
APPENDIX 1 – Workshop Program.....	17

## **EXECUTIVE SUMMARY**

This report presents the findings of nationwide civil society consultative workshops on the review of Sierra Leone's mineral sector legal and regulatory frameworks, with particular focus on the Mines and Minerals Development Act 2023 (MMDA 2023) and related regulations. The consultations were organised by the Network Movement for Justice and Development (NMJD) with support from the European Union, and were held in Bonthe District, Lunsar (Port Loko District), and Kono District, followed by a national validation meeting in Freetown.

The purpose of the consultations was to engage civil society organisations and mining-affected communities in reviewing recent legal reforms, assessing their implementation, and gathering grassroots perspectives to inform ongoing policy and legislative review processes.

### Key Issues Identified

Participants acknowledged that recent reforms demonstrate government commitment to improving mineral governance. However, they expressed strong concerns regarding the effectiveness, fairness, and enforcement of the current legal framework. Cross-cutting challenges highlighted include:

- Severe environmental impacts such as dust pollution and degraded roads
- Weak linkages between mining operations and tangible community development
- Limited enforcement of environmental and community protection provisions
- Perceived inequities in benefit-sharing arrangements
- Institutional ambiguities affecting oversight and accountability

### Major Thematic Concerns

#### 1. Ownership of Minerals

Communities questioned the continued vesting of mineral ownership solely in the State under Section 4 of the MMDA 2023. Participants argued that landowners and host communities bear the social and environmental burdens of mining and should therefore enjoy greater legal recognition and benefit from mineral ownership structures.

Recommendation: Introduce legal recognition of landowner interests in minerals, subject to state regulatory and taxation authority.

#### 2. Surface Rights and Surface Rent

The current distribution formula for surface rent was widely viewed as unfair to landowners. Communities proposed a reallocation that prioritises direct landowner benefit.

Recommendation: Revise surface rent distribution to increase landowner shares and establish clearer calculation standards.

### 3. Mineral Advisory Board (MAB) Accountability

Participants raised concerns about indemnity protections for Board members acting in “good faith,” noting the absence of a legal definition. Questions were also raised regarding inclusivity and the scope of Board authority.

Recommendations:

- Clarify “good faith” in legislation
- Strengthen accountability mechanisms
- Ensure gender inclusion in Board composition

### 4. Mineral Areas and Excluded Lands

Participants expressed concern over provisions permitting mining in areas containing public infrastructure, subject to government consent. Communities argued that public-use land should be strictly protected.

Recommendation: Prohibit mining in areas dedicated to public infrastructure and strengthen landowner consent requirements.

### 5. Community Development Framework

Weak governance structures and capacity limitations affect the functioning of Community Development Committees (CDCs).

Recommendations:

- Align CDC structures with statutory requirements
- Eliminate parallel structures lacking legal basis
- Strengthen training and oversight mechanisms

### Broader Governance Issues

Participants emphasised that legal reforms alone are insufficient without:

- Stronger enforcement

- Institutional clarity between oversight bodies
- Transparent revenue management
- Alignment with international standards such as the Extractive Industries Transparency Initiative (EITI) and the Africa Mining Vision (AMV)

## Conclusion

The consultations reveal widespread demand for legal and policy adjustments to ensure that mineral governance in Sierra Leone:

- Better protects community rights
- Distributes benefits more equitably
- Enhances environmental safeguards
- Strengthens institutional accountability

Civil society stakeholders emphasise that sustainable mineral development must balance national economic objectives with local community welfare, transparency, and long-term environmental protection.

## **FULL REPORT**

### **1. BACKGROUND**

Sierra Leone's mineral sector plays a central role in the country's economy and development. Over the past decade, the Government of Sierra Leone has undertaken various reforms aimed at improving transparency, accountability, and sustainability in the governance of mineral resources through the adoption of three mineral sector policies – (i) the Sierra Leone Minerals Policy; (ii) the Artisanal Mining Policy and (iii) the Geodata Management Policy in 2018. The Mines and Minerals Development Act 2023 was enacted and the Mines and Minerals Development Regulations 2023 were adopted. Also, the Sierra Leone Mines and Minerals Development and Management Corporation Act 2023 was enacted to create the legal framework within which the Government of Sierra Leone can directly invest in minerals production as a strategy to optimise benefits that can accrue to the state from the exploitation of mineral resources in Sierra Leone. Based on these policy, legal and regulatory regimes, efforts have been made to ensure that mineral rich communities get increased benefits from mining operations through revenue transfers to mineral rich communities to finance rural development initiatives undertaken by local councils and chiefdom councils, and ring fence mining

revenues to pay for large scale development projects in mineral rich districts benefitting chiefdoms without Community Development Funds through the Community Development Agreement frameworks and aligned with national development plans to be implemented by the central government.

At the same time, the role of host governments and Civil Society Organisations (CSOs) in enabling positive local impacts of extractives projects have been recognised. The ability of companies to align their development efforts with both these key stakeholder groups is essential, as the harnessing of extractives revenues for local development is very much the product of combined and concerted efforts. Such cooperation should focus on multistakeholder processes particularly as CSOs play a vital role in promoting accountability, public participation, advocacy and oversight in resource governance. Meaningful civil society consultations are certainly essential to ensure that mineral sector regimes review outcomes reflect the voices and interests of affected communities and stakeholders across Sierra Leone.

Despite legal and regulatory reform efforts by Government and civil society collaboration on mineral sector governance, challenges remain in the effective regulation of mining operations, enforcement of existing laws, equitable benefit-sharing, and environmental and social safeguards. While the recently enacted Mines and Minerals Development Act 2023 improved legal provisions for mineral sector governance, implementation challenges have emerged. Also, as the new law tries to remove some of the bottlenecks, new problems have been created. Improvements have been made in licencing processes but lack of clarity on institutional functions between the Ministry of Mines and Mineral Resources and the National Minerals Agency creates unhealthy rivalry between the two major institutions responsible for overseeing mineral sector operations. Also, the new mining law gives limited guidance on the application of financial bonds/guarantees to land rehabilitation and return of land subject to mining licence to their owners after mining and mineral production activities have ended or mining licence terminated resulting in abandoned mined out pits with no strategy for rehabilitation or restoration. Repatriation of revenues gained from mineral exports are provided for in the new mining law and regulations however

In recognition of these gaps, there is a growing need to review the existing legal and regulatory frameworks governing the mineral sector to ensure alignment with national development goals, international best practices, and evolving standards such as the Extractive Industries Transparency Initiative (EITI) and the Africa Mining Vision (AMV).

With support from the European Union, the Network Movement for Justice and Development (NMJD) organised nationwide consultative workshops in Bonthe District (Southern Province), Lunsar, Port Loko District (Northern

Western Province) and Kono District (Eastern Province) to solicit inputs from civil society activists and community leaders of mineral rich communities to Government's ongoing efforts to review key mineral sector regimes especially the Mines and Minerals Development Act 2023 and the Mines and Minerals Development Regulations 2023. High-level validation meeting was held in Freetown to validate the results of the regional consultations.

## **2. OBJECTIVES OF THE WORKSHOPS**

The key objectives of the community consultations were to:

1. Review the Mines and Minerals Development Act, 2023 and related legislation;
2. Sensitise communities on mining laws governing ownership, licensing, surface rights, and community development;
3. Identify the impacts of mining activities on host communities;
4. Gather community concerns, questions, and recommendations for law and policy reform.

## **3. WORKSHOP METHODOLOGY**

The nationwide stakeholder consultations were one day events held three major mining communities – each community located in one region.

Participants were drawn from other mining chiefdoms in the mineral producing regions.

Facilitated by Daniel Gbondo Esq. a mineral sector governance expert and lawyer specialised in land (property) law and contract law, the consultations were based on key legal and regulatory provisions relating to issues that mining communities have identified as critical to their concerns including ownership of minerals, functions of the Mineral Advisory Board, land use and development of mineral rich communities. Participants reflected on what changes could be made to the MMDA 2023 and the MMD Regulations 2023 that will give legal basis for increased community decision in the use of land that is subject to mining licence activities and enhance equitable distribution of benefits that accrue from mining operations. Also, participants had the opportunity to challenge perceptions about the role of government in driving community development efforts and recognised that community residents have more important roles in ensuring that legal provisions that allow for revenue distribution should be utilised for the achievement of targeted community development initiatives that are rooted in local development plans of mineral rich communities. The workshop facilitation methods aided in the process of consensus building as the facilitator solicited participants'

comments, feedback and questions on presentations made during the consultations.

#### **4. KEY ISSUES IDENTIFIED BY COMMUNITIES**

Across the three workshops, participants highlighted several recurring issues:

- i. Massive dust pollution affecting health and livelihoods; ii. Poor and deteriorated road infrastructure in mining areas;
- iii. Weak linkage between mining operations and community development;
- iv. Inadequate enforcement of laws intended to protect host communities;
- v. Dissatisfaction with surface rent distribution formulas;
- vi. Concerns over state ownership of minerals rooted in colonial-era legal frameworks. vii. Capacity gaps among members of CDC and Steering Committees to function effectively.

#### **5. MAIN PRESENTATIONS**

##### **1.1 Mines and Minerals Development Act No. 16 2023**

Key thematic areas covered included:

- i. Preliminary provisions and interpretation ii. Ownership of minerals iii. Administration and Implementation of the Act iv. Mineral Advisory Board: Indemnity of members
- v. Mineral areas and excluded lands vi. Surface rights and surface rent vii. Community development and environmental protection

##### **Thematic Area 1: Preliminary provisions and interpretation**

The consultant noted that though the preliminary provisions and interpretation section is mostly overlooked by readers of the law, it is the most powerful and frequently relied-upon parts of the law which judges and courts use to interpret the meanings of words in the Act. He explained that they establish the legal architecture of the Act and determine how every other

provision must be read, applied, and enforced. They create the foundation of the Act and determine what the law means, who it applies to, and how it must be enforced. The consultant opined that “...if these sections are weak, unclear, or unfair, the entire Act becomes unstable—no matter how detailed the rest of the law is”.

### Thematic Area 2: Ownership of minerals

Discussions on ownership of minerals focused on the question of whether the rights of landowners were considered at the time of MMDA 2023 was drafted and enacted. Participants expressed concerns that the law ignored the rights of landowners and communities when it vested ownership of minerals in the state which consequently granted the right of Government to determine exploitation of minerals. Referring to the legal definition of land which according to Black’s Legal Dictionary is defined as:

**“An immoveable and indestructible three-dimensional area consisting of a portion of the earth’s surface, the space above and below the surface, and everything growing and permanently affixed to it.”**

Across the three workshops, participants expressed strong sentiments in favour of landowners having ownership rights of minerals found on their land with the right to determine minerals production. The state, it was suggested, could exact governance regimes to guide minerals production as well as impose taxes. The participants noted that a

landowners and mineral rich communities continue to suffer disproportionate effects of mining activities yet derive very little benefits from mineral revenues and development activities of Government.

A key recommendation is for section 4 of the MMDA 2023 be amended in a manner that vests ownership of minerals in landowners who could enter into private mining agreements with private companies to mine minerals and pay taxes to Government.

### Thematic Area 3: Administration and Implementation of the Act

Another area for discussions relates to the administration and implementation of the Act. Participants noted that mineral sector governance can sometimes be hampered by lack of clarity on institutional roles and responsibilities. Specifically, it was observed that whereas the Act makes mention of operative words like “administration” and “Implementation” of the Act and vests functions in the two key institutions responsible for mineral sector governance i.e. the Ministry of Mines and Mineral Resources and the National Minerals Agency (NMA), there is no clear definition of administration and implementation which may result in duplication of implementation efforts or confusion in the discharge of institutional functions.

#### Recommendation

Administration and implementation should be defined in the Act.

### Thematic Area 4: Indemnity of Minerals Advisory Board (MAB)

Section 17 of the MMDA 2024 was identified by the participants as problematic for mineral sector governance because it seeks to indemnify members of the MAB from liability for anything “...done or omitted to be done, in good faith in the performance of any function vested in or delegated to the individual or Board as provided for in this Act.” It was observed that good faith is not defined in the interpretation section which creates lack of clarity on what constitutes “good faith”. The participants pointed out that the implication of this section is that good faith decision making would be highly unlikely where there is high level political interest in mining investment given the fact that most of the members of the Board are political appointees (appointed by the President or Government employees).

#### Recommendation

Appointment of Chairperson be made through consultations with relevant stakeholders in the sector before formal appointment. The board should be empowered in law to make binding decisions. Secondly, representation of all Ministries Departments and Agencies to the MAB must comply with the

30% female inclusion pursuant to the Gender Equality and Women's

9

Empowerment Act 2022. Certain institutions must be instructed to designate female representatives to the MAB.

#### Thematic Area 5: Mineral areas and excluded lands

Section 23 deals with lands that may be excluded from mining activities subject to the provisions contained therein. The participants expressed concerns over subsections (d), (e) and (f) because of the possibility that they could be used to deprive mining investment by holders of beneficial interests in mineral rich land. Also, these provisions allow for Government involvement in the use of land for mining purposes which may impact the use of the land for mining purposes by landowners without the consent of applicable Government agencies.

It was observed that the MMD Regulations 2023 are silent on these provisions which makes implementation tricky.

#### Recommendation

Redraft paragraph (b) to prohibit mining on land that has public infrastructure or identified for the construction of public infrastructure.

Redraft paragraph (e) by inserting 'legal' immediately before owner and

delete '...or lawful occupant and approved by the Minister of Country Planning. Paragraphs (f) and (g) to be deleted.

#### Thematic Area 6: Surface Rights and Surface Rent

Section 35 of the Act provides for compensation to landowners or lawful occupiers for loss of rights to use land but ignores compensation for other losses that occur as a result of loss of land to mining operations. The participants pointed out that the distribution formula prescribed in law is not based on a baseline thus creating opportunity for disparity in payments of surface rents by companies. It was further noted that

The distribution formula of surface rents paid to landowners is stated as unfair to landowners who consider surface rents to be private money owing and due to them and not public money. The justification for deducting local development and constituency development funds from surface rents is not legitimate some of the participants noted and argued that landowners deserve to get all surface rents paid by mining companies. They acquiesce that payments could be made to Paramount Chiefs given the fact that they are

custodians of all lands in the provinces. They recommended that the Act should be amended to reflect a fair distribution of surface rent as follows:

Landowners – 90%

Paramount Chiefs – 10%

It was further recommended that Government should develop and rollout a baseline for surface rent calculations which should take into account economic activities on the land that may be subject to mining activities and the impact on the livelihoods of landowners or lawful occupiers.

#### Recommendation

It is recommended that the MMD Regulations be amended to give clear guidelines on the content of a lease for land subject to mining activities and that payment of surface rent should be prescribed as part of compensation for loss of right to use by landowners and/or lawful occupiers.

#### Thematic Area 6: Community development

The Participants expressed appreciation for the increase in the percentage of revenues that large scale and small-scale mining companies should pay into the community development fund (CDF) to finance development activities in mineral rich communities. However, they observed that much has not been achieved in terms of utilisation of the funds because of structural bottlenecks relating to the work of the community development committees that have been established to lead development planning and implementation efforts using CDF. There was consensus that bloated number of members of the committee constrains frequency of committee meetings as sitting fees paid to committee members are eating deeply into the funds. Two CDA implementing chiefdoms for example reported that their CDCs consist of about 32 members and Le5,000 is paid to every member as sittings fees per sitting. “This figure eats up most of the CDF so we have not had CDC meetings for almost a year”, one participant who is Chairman of a CDC explained.

It was further observed that Steering Committees that have been established to approve development plans prepared by CDCs delay in approving the development plans which in many cases stall implementation of development projects.

Discussing the MMDA 2023 and the MMD Regulations 2023, the Participants noted that guidance received from the NMA about the composition of the CDC and Steering Committees are inconsistent with regulatory guidance. For example, the Regulations provide that CDC should comprise only 9 members with two members appointed by the holder of the mining licence and 7 members appointed by the Chiefdom Council and that the Chairman of the

Committee should be appointed from among members the committee appointed by the Chiefdom Council. It was therefore recommended that CDC Chairs should have constructive discussions with the NMA to review composition of CDCs to make them consistent with the Regulations. It was also observed that there is no legal basis for the establishment of Steering Committees to oversee or supervise the work of CDCs. Comments on the use of Development Plans of Local Councils raised significant interests.

#### Recommendations

Composition of CDCs should be aligned with regulatory provisions and Steering Committees should be disbanded because they have no legal basis to perform the functions they have been tasked to perform.

## **6. Conclusion**

The nationwide consultations demonstrate a clear and consistent call from civil society actors and mining-affected communities for targeted legal, regulatory, and policy reforms to strengthen mineral governance in Sierra Leone. While participants acknowledged recent legislative progress, they emphasised that effective mineral sector management must go beyond statutory reform to ensure tangible improvements in the lived realities of host communities.

Stakeholders underscored the urgent need for governance frameworks that prioritise the protection of community rights, particularly in relation to land access, surface rights, and participation in decision-making processes. There was strong consensus that existing benefit-sharing arrangements require revision to promote fairer and more transparent distribution of mining revenues, especially surface rents and community development funds, so that those directly impacted by mining activities derive meaningful and measurable benefits.

Participants also highlighted persistent environmental concerns, including land degradation, dust pollution, and inadequate site rehabilitation. As such, communities called for stronger enforcement of environmental safeguards, clearer regulatory standards, and more robust accountability mechanisms to ensure that mining operations do not compromise long-term ecological sustainability or public health.

Institutional effectiveness emerged as another critical theme. Civil society representatives emphasised the need for clearer mandates, improved coordination among oversight institutions, and greater transparency in licensing, monitoring, and compliance processes. Strengthening institutional

accountability was viewed as essential to restoring public confidence in mineral sector governance.

Overall, the consultations reinforce the principle that sustainable mineral development must strike a deliberate balance between national economic objectives and the welfare of local communities. Participants stressed that transparency, inclusivity, environmental responsibility, and equitable benefitsharing are not ancillary considerations but core pillars of responsible resource governance. Integrating these community perspectives into ongoing legal and policy review processes will be crucial to achieving a mineral sector that supports both national development and social justice.

**Mining Community Consultations**  
**Mines and Minerals Development Act Review Matrix**

<b>Issue Area</b>	<b>Current Law / Legal Position</b>	<b>Community Proposals / Positions</b>
Ownership of Minerals	Section 4, MMDA 2023: All rights to minerals in Sierra Leone are vested in the State, regardless of land ownership.	Minerals should be owned by landowners and host communities, not exclusively by the State. Government should collect taxes and royalties, not claim ownership.
Colonial Legacy of Mineral Ownership	Mineral ownership framework remains substantially unchanged from colonial-era legislation.	Communities questioned why post-independence laws retain colonial ownership concepts and called for decolonisation of mineral ownership laws.
Mineral Advisory Board (Licensing Decisions)	Section 17, MMDA 2023: Mineral Advisory Board advises on licence allocation; members protected for acts done in “good faith”.	Board members and delegated officials should be personally accountable for decisions that harm communities or violate the law.
Accountability of Boards and Delegates	Statutory protection for actions done in good faith limits liability.	Remove or limit immunity provisions; ensure accountability and sanctions for negligence, abuse, or harmful decisions.
Surface Rent – Legal Formula (Large-Scale Mining)	Section 36, MMDA 2023: <ul style="list-style-type: none"> <li>• Landowners – 70%</li> <li>• Paramount Chief – 10%</li> <li>• Constituency Development Fund – 10%</li> <li>• District Council – 10%</li> </ul>	Formula is unfair to landowners. Communities proposed 90% landowners, 10% Paramount Chiefs
Surface Rent – Paramount Chief Allocation	Paramount Chief receives mandatory 10% under the Act.	Paramount Chief’s share should be optional, reduced, or removed entirely.
Surface Rent – District Council Allocation	District Council receives mandatory 10%.	District Council allocation should be reviewed or eliminated, with more funds going directly to landowners.

Surface Rent – Small vs Large-Scale Mining	Same surface rent framework applies broadly, with limited differentiation.	Law should clearly distinguish between small-scale and large-
		scale mining, with tailored surface rent regimes.
Mining on Excluded Lands / Public Infrastructure	Section 23, MMDA 2023: Mining prohibited in excluded lands, except with written consent of government and Cabinet approval.	The exception clause should be removed entirely. Public infrastructure (roads, schools, utilities) should never be mined.
Mining on Agricultural Land	Mining permitted near cultivated land with landowner consent under prescribed distances.	Stronger protection for farmland; mining should not occur within buffer zones without free, prior, and informed consent (FPIC).
Community Development Obligations	Community development referenced, but enforcement perceived as weak.	Mining companies must be legally compelled to deliver tangible community development projects, with penalties for non-compliance.
Environmental Protection (Dust, Roads, Pollution)	Environmental obligations exist under mining and environmental laws.	Stronger enforcement needed; penalties should apply for dust pollution, road damage, and environmental harm.
Use of Mining Revenues	Revenues largely centralised, with limited direct community control.	Mining benefits should be directly invested in host communities, including infrastructure, health, and livelihoods.
Community Legal Representation	No mandatory legal support for communities.	Communities resolved to hire lawyers to protect their interests in negotiations, disputes, and policy advocacy.
Amendment of MMDA 2023	MMDA 2023 currently in force.	Communities strongly called for review and amendment of the Act to reflect community ownership, equity, and development priorities.

Environmental Bond	No legal obligation is provided to obligate licence holders to deposit environmental bond to guarantee land reclamation/rehabilitation during mine closure.	A mine closure bond fund to be established and jointly managed by the Chieftom Council and Local Council of the locality in which a large scale, small scale and mechanised artisanal mining are carried out. Such funds to be used for land
		reclamation/rehabilitation during mine closure.
Size of land for large scale mining activities in the MMDA 2023 inconsistent with the Customary Land Rights Act 2022	s109 of the MMDA 2023 sets max land for mining at 125sq.km (12,500 hectares) whereas s27 of the Customary Land Rights Act 2022 sets it at 10,000 hectares (100sq.km)	CLRA 2022 to be aligned with s109 of the MMDA 2023.

## APPENDIX 1 – Workshop Program

### CIVIL SOCIETY ON THE REVIEW OF THE MINES AND MINERALS SECTOR

#### (COMMUNITY CONSULTATIONS)

17 – 21 NOVEMBER 2025

#### AGENDA

TIME	ITEM	RESPONSIBILITY
09H00 – 09H15	<ol style="list-style-type: none"> <li>1. Prayers</li> <li>2. Welcome by Chiefdom Representative</li> <li>3. Introduction of community leaders</li> </ol>	NMJD
09H15 – 11H00	<p><u>Introducing the Mines and Minerals Development Act 2023 (MMDA 2023)</u></p> <ol style="list-style-type: none"> <li>1. Part I – Preliminary</li> <li>2. Part II – Ownership of minerals</li> <li>3. Part III – Administration and Minerals Advisory Board</li> <li>4. Part V – Mineral Areas and Excluded Lands</li> <li>5. Part VII – Surface Rights</li> <li>6. Part XVIII – Community Development</li> <li>7. Part 17 – Protection of the Environment</li> </ol> <p><i>Question and Answer</i></p>	Daniel Gbondo Esq.
11H00 – 11H15	Break	
11H15 – 12H15	<p><u>Introducing the SLMMDMC 2023</u></p> <ol style="list-style-type: none"> <li>1. The Sierra Leone Mines and Minerals Development and Management Corporation</li> <li>2. Objects and functions of the Corporation</li> <li>3. Financial Provision</li> </ol> <p><i>Question and Answer</i></p>	Daniel Gbondo Esq.
12H15 – 13H15	Lunch	

13H15 – 15H30	<u>Presentation of the Customary Land Rights Act No. 20 of 2022</u> 1. Introduction 2. Purpose and Application 3. Customary land rights and non-discrimination 4. Gender Equality 5. Chieftdom land committee and family land rights 6. Customary land rights and responsible investments 7. The National Land Rights Act 8. Conclusion	Daniel Gbondo Esq.
15H30 – 15H45	<u>Closing</u> Wrap up (Next steps)	NMJD

**REVIEW OF THE MINES AND MINERALS DEVELOPMENT ACT 2023 AND THE  
CUSTOMARY LAND RIGHTS ACT 2022**

**(HIGH LEVEL VALIDATION OF FINDINGS AND RECOMMENDATIONS)**

**3 DECEMBER 2025**

**PROGRAM**

TIME	ITEM	RESPONSIBILITY
09H00 – 09H15	<ol style="list-style-type: none"> <li>1. Prayers</li> <li>2. Welcome Statement</li> <li>3. Introduction</li> </ol>	NMJD
09H15 – 11H00	<p><u>MMDA 2023: Findings and Recommendations</u></p> <ol style="list-style-type: none"> <li>1. Part I – Preliminary</li> <li>2. Part II – Ownership of minerals</li> <li>3. Part III S6-7: Ministry responsible for administration of minerals governance and Agency responsible for providing technical assistance to Ministry</li> <li>4. S10: Minerals Advisory Board</li> <li>5. S17: Indemnity</li> <li>6. Part V – S23: Excluded Lands</li> </ol> <p><i>Question and Answer</i></p>	Daniel Gbondo Esq.
11H00 – 11H15	Break	
11H15 – 13H00	<ol style="list-style-type: none"> <li>7. Part VII – S33: Surface Rights S36: Distribution of Surface Rent  Lease (Findings on implementation)</li> <li>Part XVIII – Community Development (Implementation findings)</li> <li>8. <i>Question and Answer</i></li> </ol> <p><i>Question and Answer</i></p>	Daniel Gbondo Esq.
13H00 – 14H00	Lunch	

	<u>SLMMDMC 2023: Recommendation</u>	
	1. Objects and functions of the Corporation	
14H00 – 14H30	2. Financial Provision	Daniel Gbondo Esq.
	<u>Customary Land Rights Act No. 20 of 2022</u>	
14H30 – 15H00	1. Findings on implementation 2. S27: maximum land for investment	Daniel Gbondo Esq.
15H00 – 15H30	Wrap up and closing (Next Action)	NMJD