

PERU REPORT CARD



AMAZON GOLD GOVERNANCE REVIEW

ASSESSMENTS OF POLICY PROGRESS
AND SOLUTIONS TO CURB ILLEGAL GOLD
MINING ACROSS THE AMAZON

Authors: Júlia Péret, T. Társia, Blaise E. Bodin, Humberto M. Balbuena Pérez, Diana M. Fernández Bravo, Sandra D. La Torre Castro, Lucero D. Rojas Prado, Sidney Novoa


AMAZON
CONSERVATION



CONSERVACIÓN
AMAZÓNICA



Earth
Genome



This report presents Peru's detailed results in the [Amazon Mining Policy Scoreboard](#), an analytical tool designed to assess and compare the performance of legal frameworks, public policies, and institutional capacities related to artisanal and small-scale gold mining (ASGM). The Scoreboard integrates qualitative and quantitative indicators to identify governance challenges, recurring patterns, and areas of relative institutional strength, enabling a comparative, evidence-based assessment across Amazonian countries.

The analysis covers three dimensions: **(I)** Legal Frameworks; **(II)** Policies for Sustainable ASGM; and **(III)** Investigation and Law Enforcement. Each dimension is organized into five categories, composed of three or more objective criteria, which together generate an overall score, illustrated in the figure below.

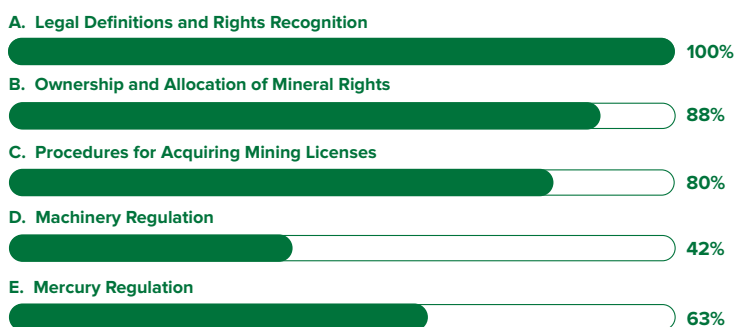
Overall Assessment Score

Aggregate score across all dimensions and criteria

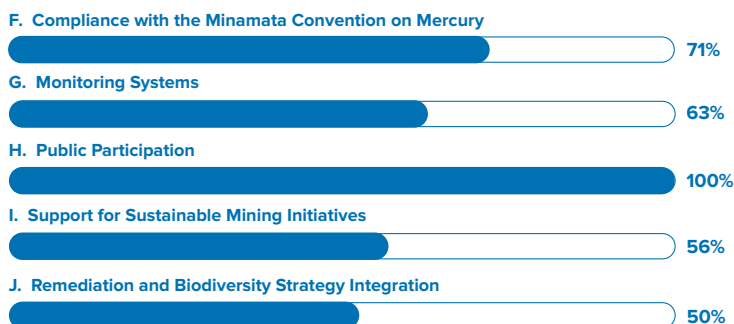
11,7 / 15 Total score across all dimensions



1 LEGAL FRAMEWORKS



2 MINING POLICIES



3 INVESTIGATION AND ENFORCEMENT



Peru ranked second overall in the Amazon Mining Policy Scoreboard, with a total score of 11.7 out of 15. The country placed behind Colombia (12.5) and ahead of Brazil (11.5), Ecuador (10.1), and Bolivia (8.3).

Detailed results for each dimension and category of the assessment are presented below. [The rationale supporting the score assigned to each specific criterion is available on the Scoreboard webpage.](#)



PERU REPORT CARD 

LEGAL FRAMEWORKS

A. Legal Definitions and Rights Recognition



B. Ownership and Allocation of Mineral Rights



C. Procedures for Acquiring Mining Licenses



D. Machinery Regulation



E. Mercury Regulation



The «**Legal Frameworks**» assesses whether a country has established the legal foundations necessary to distinguish legitimate ASGM from illegal activity. It examines the extent to which the law clearly defines what constitutes ASGM, who is authorized to engage in it, and under which conditions, including whether pathways exist for informal miners to enter formalization processes. The assessment is organized around five key categories:

- A. Legal Definitions and Rights Recognition** evaluates how mining activities are defined in law and the degree to which the rights of Indigenous and local communities are formally recognized.
- B. Ownership and Allocation of Mineral Rights** reviews the legal framework governing mineral ownership and the procedures for granting extraction rights.
- C. Procedures for Acquiring Mining Licenses** analyzes the transparency, accessibility, and requirements of the process for obtaining mining licenses.
- D. Machinery Regulation** assesses the controls and restrictions applied to the types of machinery permitted in mining operations.
- E. Mercury Regulation** examines the legal framework governing the use, handling, and trade of mercury, a substance with significant environmental and public-health implications.

Peru **ranked fourth** in the region in the strength of its legal frameworks to address illegal gold mining, following Colombia, Brazil, and Ecuador.

The country received a perfect score on the indicator assessing **legal definitions and the recognition of rights** within the ASGM gold sector. This reflects a robust and detailed legal framework in which:

- The **use of dredges and similar equipment is prohibited** in all water bodies, including rivers, lakes, lagoons, wetlands, and floodplains, and the **use of mercury and cyanide in mining operations is banned**. These measures establish clear environmental and operational safeguards aimed at curbing the most harmful ASGM practices¹.
- Peruvian legislation provides **precise legal definitions** for artisanal miners and small-scale mining producers, based on installed production and processing capacities expressed in metric tons per day. These technical thresholds clearly **differentiate ASGM from medium- and large-scale mining**².
- The law specifies the **legal conditions under which ASGM may operate**, formally distinguishing lawful artisanal and small-scale mining from illegal mining activities.
- Gold buyers are subject to due-diligence obligations, including mandatory verification of mineral origin through official information systems⁴.

1 - Peru. Legislative Decree No. 1100.

2 - Peru. Consolidated Text of the General Mining Law (Supreme Decree No. 014-92-EM).

3 - Peru. Law No. 27651 — Law for the Formalization and Promotion of Artisanal and Small-Scale Mining.

4 - Peru. Legislative Decree No. 1107 (2012).

Peru also performs strongly in terms of **transparency and public access to mining information**.

- The Geological, Mining and Metallurgical Institute (INGEMMET) manages the national mining cadaster, which is **publicly accessible** through its online platform.
- Tools such as GEOCATMIN and the Electronic Mining Cadaster **allow users to consult detailed information on mining concessions**, including their location, ownership, and legal status.
- The Comprehensive Registry for Mining Formalization (REINFO) is likewise **publicly accessible** and provides information on miners currently undergoing the formalization process.
- Despite these strengths, several gaps remain. There is no clear information on how frequently GEOCATMIN data are updated, and inconsistencies persist in concession records, including overlaps with areas where mining is prohibited. In addition, REINFO does not publish the coordinates of the mining exploitation unit, a key element for ensuring effective traceability of gold.

Despite these strengths, several **transparency gaps** persist:

- The **frequency with which information on platforms such as GEOCATMIN is updated** remains unclear, limiting users' ability to assess the timeliness and reliability of the data.
- Inconsistencies persist between granted or pending mining concessions and the layers of prohibited areas, revealing contradictory practices such as the issuance of concessions in water bodies, Indigenous reserves, or protected areas.
- REINFO **omits critical information**, including the coordinates of the mining exploitation unit, which significantly constrains the ability to ensure effective mineral traceability.

In addition, significant gaps remain in the **regulation of tenure duration and concession reassessment**.

- Law No. 27651 does not establish a specific fixed term for mining rights granted to ASGM operators. In practice, the **continuity of these rights depends on the annual payment of tenure fees** and the renewal of concessions, subject to differentiated deadlines and payment amounts.
- These renewals are not tied to mandatory environmental or social impact evaluations. Although mining rights are linked to compliance with the minimum annual production requirements set out in Articles 6 and 7, **the legal framework ultimately prioritizes the continuity of tenure over the periodic review of regulatory compliance**.

Peru also presents notable weaknesses in the **regulation of mining machinery**:

- Although the Consolidated Text of the General Mining Law (Supreme Decree No. 014-92-EM) establishes operational and safety obligations for concession holders, and the formalization process requires operators to declare the machinery they use, there is still **no specific or rigorous control regime governing the machinery employed in mining activities**, particularly within the ASGM sector.
- There is **likewise no centralized, publicly accessible registry of heavy machinery used** in mining. While miners undergoing formalization must declare their equipment, this information is not consolidated into a transparent public database, limiting oversight and constraining effective enforcement.



2

PERU REPORT CARD 

MINING POLICIES

F. Compliance with the Minamata Convention on Mercury



G. Monitoring Systems



H. Public Participation



I. Support for Sustainable Mining Initiatives



J. Remediation and Biodiversity Strategy Integration



The «**Mining Policies**» dimension evaluates how effectively mining policies are implemented in practice and the extent to which the country demonstrates a commitment to sustainable and responsible mining. It also examines the policy instruments and institutional arrangements in place to mitigate the environmental and social impacts of ASGM, in line with international standards and recognized best practices. This dimension is structured around five categories:

- F. Compliance with the Minamata Convention on Mercury** assesses national progress in implementing this key international treaty aimed at reducing mercury pollution.
- G. Monitoring Systems** evaluates the effectiveness of mechanisms established to oversee mining activities and their environmental and social impacts.
- H. Public Participation** examines the opportunities and mechanisms available for meaningful public engagement in mining-related decision-making.
- I. Support for Sustainable Mining Initiatives** reviews government efforts to promote and strengthen more sustainable and responsible mining practices.
- J. Remediation and Biodiversity Strategy Integration** analyzes how national policies address the remediation of mining-affected areas and incorporate biodiversity conservation into the broader mining strategy.

Peru received its lowest score in the Mining Policies dimension.

Although the country has signed and ratified the Minamata Convention on Mercury and has met its initial reporting obligations, submitting both the Initial Assessment and the National Action Plan, **these commitments have not yet translated into regulatory measures or incentive structures that promote more sustainable ASGM practices.**

Peru has relatively well-developed **environmental monitoring systems relevant to ASGM.**

- On paper, the Environmental Assessment and Enforcement Agency (OEFA) operates the **Environmental Oversight Interactive Portal (PIFA)**, which provides maps, information on regulated entities, inspection tracking, and enforcement statistics across all sectors, including mining. OEFA also publishes reports and conducts targeted oversight actions related to artisanal and small-scale mining.
- In parallel, the Ministry of the Environment (MINAM) manages the **National Environmental Information System (SINIA)**, which centralizes environmental data—indicators, maps, statistics, publications, and technical guidelines—that can be used to assess ASGM-related impacts such as land-cover change, water quality, and mercury contamination.
- However, **these monitoring tools are considerably more effective for medium- and large-scale mining.** In the ASGM sector, monitoring remains limited due to widespread informality and constrained institutional capacity. **No evidence was identified of government-led social monitoring systems designed specifically for ASGM.**

Peru has established formal legal channels for **civil-society participation** in environmental monitoring and oversight.

- Public information and participation processes are mandatory in environmental impact assessments, including public notices, hearings, and access to project documentation.
- The country also maintains an official, accessible, secure, and functional mechanism for submitting environmental complaints through the National Environmental Information and Complaints Service (SINADA), administered by OEFA.

The government further promotes the adoption of **safer, mercury-free technologies**, primarily through public programs and international cooperation initiatives.

- These efforts include training activities, the provision of gravity-based processing plants, technical assistance, and the development of regulatory frameworks.
- **However, these measures are implemented on a project-by-project basis**, rather than through permanent fiscal incentives or dedicated tax regimes.
- Peru also **lacks accessible, state-supported financing mechanisms to encourage sustainable practices in ASGM**. Limited access to credit remains one of the main barriers preventing artisanal and small-scale miners from adopting cleaner technologies and improving their environmental performance.



3

PERU REPORT CARD 

INVESTIGATION AND ENFORCEMENT

K. Gold Supply Chain Regulation and Transparency



L. Public Security and Investigation of Mining-Related Crimes



M. Judicial Oversight and Jurisprudence



N. Restrictions, Law Enforcement, and Accountability



O. Economic and Criminal Sanctions



The «**Investigation and enforcement**» dimension focuses on the core elements of accountability and the enforcement of mining laws and regulations. It assesses the State's capacity and effectiveness in ensuring compliance, investigating illicit activities, and holding perpetrators accountable. The evaluation is organized into five categories:

- K. Gold Supply Chain Regulation and Transparency** examines the measures in place to regulate and ensure transparency along the gold supply chain, from extraction to export.
- L. Public Security and Investigation of Mining-Related Crimes** evaluates the capacity of law-enforcement agencies and the justice system to investigate and prosecute offenses linked to mining.
- M. Judicial Oversight and Jurisprudence** assesses the role of the judiciary in overseeing mining activities and shaping legal precedent in this area.
- N. Restrictions, Law Enforcement, and Accountability** evaluates the specific restrictions applied to mining activities and the effectiveness of enforcement actions to ensure compliance.
- O. Economic and Criminal Sanctions** examine the application of sanctions for illegal mining and related criminal conduct.

Peru received the **highest score in the region** in the law-enforcement and investigation component.

Gold producers are required to register in the **Comprehensive Registry for Mining Formalization (REINFO)** during the formalization process or, once formalized, in the official registries for artisanal and small-scale mining producers⁵.

The commercialization of gold is **restricted to authorized traders and processors** listed in the Special Registry of Gold Traders and Processors. **Good-faith assumptions regarding the origin of gold do not apply**, and financial traceability is a central safeguard to prevent illegally sourced gold from entering the formal economy.

Peru also performs strongly in financial **due diligence and anti-money laundering controls** related to gold.

- Financial institutions, gold traders, and exporters are designated as obligated entities under Law No. 27693, which established the Financial Intelligence Unit of Peru (UIF-Peru). These actors must **identify and verify clients, maintain transaction records**, and report suspicious operations.
- Complementary regulations issued by the Superintendency of Banking, Insurance, and Pension Funds (SBS) require **enhanced due diligence** and know-your-customer procedures for high-risk activities, including gold-related transactions.

5 - Law No. 27651.

Peru has also built a **solid institutional framework for investigating and prosecuting environmental crimes**, including illegal gold mining.

- **Specialized units** within both the National Police and the Office of the Attorney General enable coordinated inspections, interventions, and criminal prosecutions across mining regions.
- The National Police, through its environmental and illegal-mining divisions, **conducts field operations** in coordination with the Specialized Environmental Prosecutor's Office, which leads investigations and prosecutions related to illegal mining and environmental contamination.

Criminal networks involved in the illegal gold trade are also subject to targeted investigations and prosecutions.

- The National Police of Peru (PNP) and the Office of the Attorney General, through the **Specialized Environmental Prosecutor's Offices (FEMA)** and organized-crime units, investigate organizations engaged in the financing, transport, and commercialization of illegal gold.
- Law No. 30077, the Law Against Organized Crime, formally classifies illegal mining as an organized criminal activity, enabling authorities to apply **special investigative techniques and impose more stringent penalties**.



INTERPRETATION OF RESULTS IN THE NATIONAL CONTEXT

In 2024, Peru's mining sector accounted for roughly 9% of national GDP and generated over 64.2% of total export value, according to the Ministry of Energy and Mines⁶. The industry also supported more than 238,860 formal direct jobs, and each direct position is estimated to sustain an additional 8.2 jobs across associated activities and supply chains. Mining therefore remains a cornerstone of the Peruvian economy, with gold playing a particularly prominent role. Yet an estimated 68% of exported gold was never formally declared, underscoring persistent, systemic gaps in traceability, oversight, and supply-chain control⁷.

By mid-2025, gold-mining-related deforestation had reached approximately 139,169 hectares nationwide, with the Madre de Dios region accounting for 97.5% of this total impact. Significant levels of mining-driven deforestation have also been identified in the regions of Huánuco and Puno, with 1,262 and 1,014 hectares affected, respectively⁸.

In 2025, the Peruvian government adopted a multi-year national strategy to combat illegal mining through 2030⁹. The strategy places a strong emphasis on oversight, investigation, regulation, and coordinated intervention measures.

Despite the country having a relatively clear and comprehensive legal framework for ASGM on paper, ASGM actors in Peru continue to evade regulation, and the activity has continued to expand illegally across multiple regions of the country. Operations persist in using prohibited machinery and in operating within protected or otherwise restricted areas.

While state-led enforcement operations in Peru have produced episodic reductions in illegal mining, they have not resulted in a sustained decline in the sector or in its environmental impacts. Between 2023 and 2025, the area affected by mining increased

6- Ministerio de Energía y Minas de Perú – MINEM (2025). Anuario Minero 2024. Disponible en: <https://cdn.www.gob.pe/uploads/document/file/8155729/6827926-anuario-minero-2024-minem.pdf?v=1749053631>

7 - Ministerio de Energía y Minas de Perú – MINEM (2025). Anuario Minero 2024. Disponible en: <https://cdn.www.gob.pe/uploads/document/file/8155729/6827926-anuario-minero-2024-minem.pdf?v=1749053631>

8 - MAAP #223. Situación actual de la minería de oro en la Amazonía peruana. Disponible en: <https://www.maaprogram.org/es/mineria-oro-peru-2025/>

9 - Decreto Supremo N.º 003-2025-IN

by 66.9%¹⁰. MAAP reports on illegal gold mining in Peru indicate that, by mid-2025, gold-mining-related deforestation in the Peruvian Amazon had surpassed 139,000 hectares, almost entirely concentrated (97.5%) in Madre de Dios, with new mining fronts emerging in regions such as Loreto, Amazonas, Huánuco, Pasco, and Ucayali¹¹.

One of the Peruvian government's strategies was to designate an area where mining would be permitted, provided that miners entered the formalization process, known as the «Mining Corridor» in Madre de Dios. However, satellite monitoring shows significant mining-driven deforestation both inside and outside this corridor. This indicates that, although a large share of activity occurs within the corridor's legal boundaries, a substantial portion of deforestation is taking place outside them, in areas where mining is prohibited and therefore likely illegal¹².

Data from civil-society organizations and local reporting suggest that the formalization process has largely stalled, hindered by persistent compliance barriers, limited state capacity to verify and supervise registered operators, and weak enforcement of conditional requirements¹³.

Despite legislative commitments and administrative mechanisms intended to formalize artisanal and small-scale mining, such as REINFO, tangible progress remains limited. Illegal and unregulated mining continues both within and beyond designated areas, including inside the Madre de Dios Mining Corridor.

These patterns indicate that formalization efforts have not kept pace with conditions on the ground¹⁴. The gap between formal regulatory frameworks and their effective implementation is reflected in the persistent environmental footprint of ASGM and its continued expansion into forested and riparian ecosystems.

At the same time, the rapid growth of gold mining has reshaped local governance dynamics in Madre de Dios. Investigative reporting shows that mining interests

10 - Amazon Mining Watch. Perú. 2025. Disponible en: <https://amazonminingwatch.org/pt?areaType=countries&areald=PER&areaName=peru&zoom=4.29&lng=-73.96&lat=-7.79>.

11 - Mapa n.º 233. Situación actual de la minería de oro en la Amazonía peruana. 2025. Disponible en: <https://www.maaprogram.org/gold-mining-peru-amazon/>

12 - MAAP #2008. Minería de Oro en la Amazonía peruana sur, resumen 2021-2024. 2024. Disponible en: <https://www.maaprogram.org/es/maap-208-mineria-de-oro-en-la-amazonia-peruana-sur-resumen-2021-2024-2/>

13 - Rumbo Minero. La formalización minera se estanca por la burocracia estatal, advierte Arenas. 2025. Disponible en: <https://www.rumbominero.com/peru/noticias/mineria/exclusivo-formalizacion-minera-se-estanca-por-la-burocracia-estatal-advierte-arenas/#:~:text=En%20el%20Per%C3%BA%2C%20cerca%20de,espera%20de%20completar%20el%20procedimiento.>

La República. REINFO: se entrapa el debate sobre ampliación del plazo en la Comisión de Energía y Minas. 2024. Disponible en: <https://larepublica.pe/politica/2024/11/28/reinfo-se-entrapa-el-debate-sobre-ampliacion-del-plazo-en-la-comision-de-energia-y-minas-noticias-peru-863660>.

Mongabay. Perú: en medio de críticas, el Congreso amplía por seis meses el plazo para la formalización minera. 2024. Disponible en: <https://es.mongabay.com/2024/12/peru-en-medio-de-criticas-congreso-amplia-plazo-para-formalizacion-minera/>

14 - Bringas Aguirre, María A.; Osorio Santos, Claudia E.; Rojas de la Cruz, Víctor D. Impacto del cumplimiento ambiental en la prevención de la contaminación por minería informal en el Perú: Análisis del Registro Integral de Formalización Minera – REINFO como herramienta regulatoria. Universidad Esan. 2025.

are deeply intertwined with subnational political structures, including regional and municipal authorities with direct ties to the sector. The regional governor of Madre de Dios has been documented as having a background as a mining entrepreneur, and several local authorities hold mining titles or are registered in the formalization system. This convergence of political authority and mining-related economic interests has been identified as a key factor undermining regulatory reform, institutional coordination, and the enforcement of environmental and mining regulations¹⁵.

This capture dynamic is not limited to subnational government structures; it extends throughout the entire gold supply chain. In practice, illicitly sourced ore enters the formal market through processing plants, taking advantage of the absence of standardized procedures to verify mineral origin at the beneficiation stage. The lack of integrated information systems among oversight entities (MINEM, SUNAT, MTC, regional governments, and OEFA) enables a significant share of informally or illegally extracted ore to be blended with formal production without triggering timely alerts or sanctions (Balbuena et al., 2026)¹⁶. This absence of effective traceability across the chain sustains structural economic incentives for illicit practices, regardless of the political will of individual officials.

Environmental compliance in Peru's artisanal and small-scale gold mining (ASGM) sector faces complex structural barriers, including weak regional enforcement capacity, limited technical and financial resources, and political instability. Preliminary findings from the indicator framework suggest that addressing these challenges will require a multifaceted strategy that combines institutional strengthening, economic incentives, enhanced public participation, and improved oversight mechanisms. A critical starting point, however, is the strengthening of traceability systems, as these underpin broader control over the gold value chain, reduce incentives for illegality, and facilitate the implementation of complementary measures.

Regarding transparency tools for ASGM such as REINFO, practice has shown that the registry has operated more as a mechanism for prolonged tolerance of informality than as an effective pathway toward legality. The indefinite use of temporary registrations and authorizations has been leveraged to conceal illegal activities, facilitate access to inputs, and enable the commercialization of gold without meaningful verification of its origin¹⁷. This reveals a significant gap between the regulatory framework and its effective implementation on the ground.

15 - Al Margen: Cuando el oro gobierna: políticas y criminales se disputan los recursos de la Amazonía peruana. 2025. Disponible en: <https://almargen-media.com/cuando-el-oro-gobierna-politicos-y-criminales-se-disputan-los-recursos-de-la-amazonia-peruana/>

16 - Balbuena, H., Fernández, D., La Torre, S, & Rojas, L. (2026). Estrategia para enfrentar los delitos ambientales en la Amazonía. Conservación Amazónica – ACCA.

17 - Balbuena, H., Fernández, D., La Torre, S, & Rojas, L. (2026). Estrategia para enfrentar los delitos ambientales en la Amazonía. Conservación Amazónica – ACCA.

In its response to Amazon Conservation on the indicator results, the Office of the Attorney General acknowledged limitations in the oversight of machinery, financing, and mining inputs associated with illegal mining.

The Office concurred that establishing a National Registry of Heavy Machinery with mandatory GPS tracking, together with stricter controls on hazardous substances such as mercury and the promotion of alternative technologies, should be considered priority measures within a preventive approach to environmental crimes linked to ASGM.



RECOMMENDATIONS

A set of recommendations to the Government of Peru is presented below to strengthen the governance of artisanal and small-scale gold mining (ASGM). These recommendations are based on the analysis of the three dimensions of the Mining Governance Scorecard and on the interpretation of the results within the national context.



1. Implement a National Registry of Heavy Machinery with mandatory GPS tracking.

Recognized as a priority measure by the Office of the Attorney General, this action is essential to strengthen oversight and control over the use of machinery in mining activities, making it more difficult for such equipment to be deployed in prohibited areas or in illegal operations.

Relevant Institution(s)

Ministry of Transport and Communications (MTC); Superintendence of Land Transportation of People, Cargo and Goods (SUTRAN); Ministry of Energy and Mines (MINEM).



2. Establish a fixed validity period for ASGM mining rights, subject to periodic reassessments.

Law No. 27651 should be amended to introduce defined terms for ASGM concessions, with renewals conditioned on mandatory evaluations of environmental and social impacts, thereby ensuring more responsible mining practices.

Relevant Institution(s)

Congress of the Republic; Ministry of Energy and Mines (MINEM).



3. Develop and implement fiscal incentives and financing mechanisms for the adoption of clean technologies.

To translate Peru's commitments under the Minamata Convention into concrete action, it is essential to establish a permanent system of fiscal incentives and accessible credit lines that promote the transition toward mercury-free ASGM.

Relevant Institution(s)

Ministry of Economy and Finance (MEF); Ministry of the Environment (MINAM); Ministry of Energy and Mines (MINEM).



4. Strengthen the oversight and enforcement capacity of regional governments.

It is imperative to provide regional governments, particularly in high-intensity mining areas such as Madre de Dios, with greater technical, financial, and human resources so they can effectively fulfill their role in environmental oversight and supervision of ASGM operators.

Relevant Institution(s)

Presidency of the Council of Ministers (PCM); Regional Governments.



5. Design and implement a government-led social monitoring system for ASGM.

In addition to environmental monitoring, a social monitoring system should be developed and operationalized to assess and mitigate the social impacts of ASGM, including conflicts, labor conditions, and effects on local communities.

Relevant Institution(s)

Ministry of Energy and Mines (MINEM); Ministry of Women and Vulnerable Populations (MIMP); Office of the Ombudsman.



6. Conduct a comprehensive audit and validation of the Comprehensive Registry for Mining Formalization (REINFO), including the removal of irregular or illegitimate entries.

Given the widely questioned effectiveness of REINFO, a thorough audit is needed to verify the information provided by registered miners, identify and remove actors who do not meet legal requirements, and ensure that the formalization process operates transparently and effectively. Following this audit, the design of the formalization process itself must be revisited: REINFO has functioned as a mechanism for prolonged tolerance of informality, lacking definitive deadlines and preclusive milestones that distinguish miners who are genuinely progressing toward formalization from those who use the system to shield illegal activities (Balbuena et al., 2026).

Relevant Institution(s)

Ministry of Energy and Mines (MINEM); Office of the Comptroller General; Regional Governments.



7. Implement a multisectoral and multilevel intervention strategy in new areas of illegal mining expansion.

With new mining fronts emerging in regions such as Loreto, Amazonas, and Huánuco, coordinated and preventive state action is required to prevent the consolidation of illegal mining in these areas. This strategy should integrate environmental, security, and territorial-governance components to contain early-stage expansion.

Relevant Institution(s)

Presidency of the Council of Ministers (PCM); Ministry of Energy and Mines (MINEM); Ministry of the Interior (MININTER); Regional Governments.



8. Establish stricter controls on the sale and distribution of chemical inputs, particularly mercury.

Oversight and enforcement mechanisms over the supply chain of chemical inputs used in illegal mining must be strengthened, with a specific focus on mercury. Additionally, SUNAT manages a registry of hazardous chemical inputs used in mining; public access to this registry should be enabled to reinforce social oversight and citizen monitoring of the consumption and commercialization of these substances. Making this registry public would help identify anomalous purchasing patterns that signal the misuse of mercury in illegal mining (Balbuena et al., 2026). This effort must be complemented by active cross-border cooperation with neighboring countries: border areas with limited state control facilitate mercury smuggling at a scale that exceeds Peru's unilateral enforcement capacity. Joint operational protocols among FEMA, the National Police (PNP), and the Ministry of Foreign Affairs are therefore indispensable.

Relevant Institution(s)

National Superintendency of Customs and Tax Administration (SUNAT); Ministry of the Environment (MINAM); Ministry of Foreign Affairs; Specialized Environmental Prosecutor's Office (FEMA); National Police of Peru (PNP).



9. Promote the investigation and sanctioning of conflicts of interest within regional and local public administration.

To address institutional capture by mining interests, it is essential for the Office of the Comptroller General and the Office of the Attorney General to actively investigate and sanction cases involving authorities with direct economic ties to the mining sector. To operationalize this mandate, it is recommended that the Comptroller General establish a specialized environmental oversight division, staffed with personnel trained to identify cases of illegal granting of mining rights and corrupt practices linked to the illegal gold supply chain. This specialization is critical: without staff with technical knowledge of the mining sector and environmental management instruments, the Comptroller lacks the capacity to detect the most common patterns of irregularity.

Relevant Institution(s)

Office of the Comptroller General; Office of the Attorney General (Fiscalía de la Nación).



10. Improve inter-institutional coordination for investigating illegal mining financing networks.

Collaboration among the Financial Intelligence Unit (UIF), the Office of the Attorney General, and the National Police must be strengthened to dismantle the criminal networks that finance, transport, and commercialize illegally sourced gold.

Relevant Institution(s)

Financial Intelligence Unit (UIF-Peru); Office of the Attorney General (Fiscalía de la Nación); National Police of Peru (PNP).

AMAZON
CONSERVATION



CONSERVACIÓN
AMAZÓNICA

