

Report



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in small-scale gold mining.

A GEF Initiative

Documentation of planetGOLD Programme: Formalization Interventions in Peru

December 2024

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Abbreviations/Acronyms

Abbreviation/Acronym	Definition
ASGM	Artisanal and Small-scale Gold Mining
ASM	Artisanal and Small-Scale Mining
BGI	Better Gold Initiative
CEPLAN	National Center for Strategic Planning
DGFM	General Direction of Mining Formalization
DREM	Regional Direction of Mining
GEF	Global Environment Facility
GREM	Regional Bureau of Mining
MEF	Ministry of Economy and Finances
MIDAGRI	Ministry of Agrarian Development and Irrigation
MIDIS	Ministry of Development and Social Inclusion
MINAM	Ministry of the Environment
MINEM	Ministry of Energy and Mines
MININTER	Ministry of the Interior
MINTRA	Ministry of Labor
PRODUCE	Ministry of Production
RREE	Ministry of Foreign Affairs
REINFO	National Registry of Mining Formalization
REPCO	National Registry of Gold Traders and Processors
SUNARP	Public Registry Authority
SUNAT	Taxing Authority
UNDP	United Nations Development Programme
WIM	Women in Mining

Executive Summary

The planetGOLD Peru project, part of the planetGOLD programme, was funded by the Global Environment Facility (GEF), implemented by the United Nations Development Program (UNDP) and executed the UNDP Peru country office, in partnership with the Ministry of Energy and Mines (MINEM) and the Ministry of the Environment (MINAM). Its main objective was to reduce, eliminate or avoid mercury emissions related to artisanal and small-scale gold mining (ASGM) in Peru. One pillar of the project supported the formalization of the ASGM sector through three key interventions:

- Intervention 1: Assistance with National Multisectoral Policy for Artisanal and Small-Scale Mining (2021 – 2030).
- Intervention 2: Identification of high-priority ASGM organizations for a more precise formalization assistance approach.
- Intervention 3: Increasing the visibility and supporting women in ASGM, the pallaqueras.

The main outcomes of these interventions included:

- Publication of a National Multisectoral Policy for ASM.
- 32 ASGM organizations formalized.
- 3 women ASGM associations and 1 national network of women in ASM created.

Achieving these goals required following several cross-cutting approaches, including:

- Categorizing and defining target groups with sound criteria.
- Promoting bottom-up policy framing and definition of solutions and opening meaningful participation spaces for all stakeholders.
- Providing in situ, hands-on support and fostering a peer-peer learning environment.
- Articulating messages that combined environmental sustainability with business efficiency.
- Leveraging program commitments to change national-level regulation and policy.
- Aligning goals with similar programs, as part of initiatives to guarantee the continuity of the project's initiatives on a national basis.

planetGOLD Peru's activities have notably impacted formalization in the country. By contributing with a national level policy, the program has advocated for a more comprehensive understanding of formalization going beyond legal rights. This understanding includes compliance following environmental and social standards and centering a value chain approach in formalization initiatives, as well as a gender perspective.

1 Introduction

The planetGOLD Peru project, part of the planetGOLD programme, aimed to reduce, eliminate or avoid mercury emissions related to artisanal and small-scale gold mining (ASGM) in Peru. The project funded by the Global Environment Facility (GEF), implemented by the United Nations Development Programme (UNDP), and executed the UNDP Peru country office, in partnership with the Ministry of Energy and Mines (MINEM) and the Ministry of the Environment (MINAM). The project officially started on June 2019 and was completed in December 2024.

To achieve its mercury reduction objectives, the project carried out four key strategies:

- Strengthening institutions and legal frameworks for a mercury-free ASGM.
- Identifying financial mechanisms to support the purchase of mercury-free technologies.
- Supporting ASGM communities' capacity development through technical assistance, technological transfer and formalization support.
- Raising awareness on mercury impacts, best practices, and lessons learned for a mercury-free ASGM.

This report synthesizes planetGOLD Peru's initiatives that supported the formalization of ASGM, covering substantive elements of strategies 1 and 3. For this report, formalization refers to country program activities aimed at improving laws, regulation, law-enforcement, governance mechanisms and systems and capacity building to support the transformation of artisanal and small-scale mining into a responsible economic sector.

The report first gives an overview of background information to contextualize formalization initiatives, and then presents three key interventions that supported the formalization of ASGM in Peru: (a) national policy support, (b) development of a novel tool to target support to ASGM communities, and (c) efforts to increase the visibility of women in ASGM. The report concludes with key lessons learned and recommendations.

2 Background and Context

As a key global gold producer with substantive ASGM participation, Peru has supported ASM formalization over the past 22 years. planetGOLD Peru aimed to bridge the country's commitments under the Minamata Convention to reduce or eradicate mercury emissions in line with ASGM formalization initiatives.

In 2019, Peru was the world's 7th largest gold producer. Artisanal and small-scale gold mining (ASGM) accounted nearly 22% of gold production.¹ While this sector supports the livelihoods of around 1 million people, it has also been estimated to release up to 55.3 tonnes of mercury to the environment due to the amalgamation process.² Under the Minamata Convention, Peru committed to reduce or eliminate, when possible, mercury use in ASGM. The planetGOLD Peru project aimed to support the Peruvian government and ASGM communities in achieving this goal.

Law enforcement's ability to regulate ASGM mercury emissions is challenged by the sector's prevailing informality. Although a 2002 law enacted artisanal and small-scale mining formalization, the process was more comprehensively regulated in 2012.³ In 2017 the government created the National Registry of Mining Formalization (REINFO, in Spanish) to consolidate all applications and introduce a step-by-step formalization process.⁴

One of the key pillars of planetGOLD Peru was to support a formalization initiative aligned with the commitments of the Minamata Convention. One element of this support was to provide inputs for country-level strategic planning for artisanal and small-scale mining (ASM).

Simultaneously, the project targeted representative ASGM organizations with technical assistance and capacity development on formalization, which were sensitive to gender differences. These tasks were complemented with specific actions in the development of financial mechanisms and technological transfer⁵, under other pillars of the project.

¹ MINEM. (2024). Minerals Yearbook 2023.

² MINAM. (2020). Evaluación inicial del Convenio de Minamata sobre el mercurio en el Perú.

³ Law 27651 (2002); Decree Law 1105 (2012).

⁴ The current formalization deadline is December 2025.

⁵ planetGold. (2024). [Documentation of planetGOLD Peru ASGM Financial Inclusion Interventions](#). planetGold Peru. (2023). [Technology transfer activities in Peru](#).

3 Formalization Interventions

Considering the background context, the following specific interventions were chosen to address key formalization issues, taking into account their lasting impact among partner networks, allied organizations and collaborators:

- **Intervention 1: Assistance with a National Multisectoral Policy for Artisanal and Small-Scale Mining (2021 – 2030).**

The development of this policy was recommended by the Commission for Sustainable Mining Development.⁶ The General Direction of Mining Formalization (DGFM, in Spanish) was tasked to steer the process. planetGOLD Peru provided technical assistance to the process.

- **Intervention 2: Identification of high-priority ASGM organizations for a more precise formalization assistance approach.**

ASGM is highly heterogeneous. Miners have different degrees of possibilities to achieve formalization. The program developed a tool to categorize groups according to their likelihood to complete formalization and provided targeted assistance.

- **Intervention 3: Increasing visibility and supporting women in ASGM, the *pallaqueras*.**

This intervention comprises a complex of activities aimed at supporting women gold recyclers, colloquially known as *pallaqueras*. Activities include technical assistance to create an ASGM Gender inclusive National Action Plan and the creation of *pallaqueras* associations.

The following sections provide detailed information on each of these interventions.

Formalization Intervention 1: Multisectoral National Policy for Artisanal and Small-Scale Mining

Peru's formalization law was enacted in 2002. However, it was not accompanied by a comprehensive formalization policy. planetGOLD Peru supported the development of a 360-degree national policy. For the first time, local stakeholders were included in ASGM policy formulation. The methodology considered gender-differentiated approximations for nuance in problem framing, increasing visibility of the condition of vulnerable ASGM communities.

⁶ An independent expert body on mining affairs summoned by the national government. Resolución Suprema No. 145-2019-PCM.

Description of the Intervention

The Multi-sectoral National Policy⁷ aimed to provide transformative, holistic and comprehensive solutions to regulate and support ASGM improvement in Peru. This policy was one of the recommendations formulated by the Commission for Sustainable Mining Development,⁸ which was conveyed by the national government to address mining conflicts across all mining scales.

The Plan was supported by planetGOLD Peru in collaboration with allied non-governmental organizations, including Solidaridad.⁹ planetGOLD Peru provided resources to run problem diagnosis and convene stakeholder participation. Importantly, planetGOLD Peru's experts were also part of policy framing and consultation.

The resulting plan is different from previous initiatives in two central aspects.¹⁰ First, it centers on formalization as part of system-wide transformations needed to improve ASGM. Therefore, it includes but is not limited to ASGM entitlement to mining and surface land rights but includes other crucial components. The key policy goals are:

- Reduce the precariousness of labor, social and environmental conditions in ASGM.
- Improve ASGM access to formal value chains.
- Improve ASGM access to mining rights and surface land use permits.
- Strengthen inter-institutional articulation and capacity among ASGM-related entities.

Second, the policy was formulated following the guidelines of the National Center for Strategic Planning (CEPLAN, in Spanish), an expert technical unit tasked to steer the National System of Strategic Planning. CEPLAN's methodology included the application of at least ten qualitative techniques to diagnose the problem and build consensus towards key actions and intervention arenas. The application of the methodology fomented the opening of a democratic dialogue and envisioned sustainable ASGM pathways.

⁷ [Política Nacional Multisectorial para la Pequeña Minería y Minería Artesanal \(2021 – 2030\). Entregable Final según la Guía de Políticas Nacionales del CEPLAN. Julio 2022.](#) Decreto Supremo No. 016-2022-EM.

⁸ C.f. Footnote 6.

⁹ Solidaridad Network. (2022). Nueva Política nacional para la MAPE en Perú. https://www.youtube.com/watch?v=LvnH8MFPg_o

¹⁰ Comisión Técnica Multisectoral D.S. No. 045-2010-PCM. (2010). *Propuesta “Plan Nacional para la Formalización de la Minería Artesanal”*

A major outcome was the definition of policy guidelines and the identification of government institutions central to achieving policy goals from a multi-sectoral perspective. For policymakers, ASGM was previously solely associated with formalizing mining rights, therefore under the purview of the mining sector and local authorities.¹¹ In contrast, the National Policy presents a more comprehensive set of holistic interventions around ASGM transformation, involving other government institutions with limited or no historic involvement in ASGM, such as the Ministry of Women, Development and Social Inclusion.

Target Areas and Target Groups

The National Policy targeted actors and organizations related to ASM, including miners, traders, processing plants, and government institutions tasked to provide supporting services to protect vulnerable populations.

The diagnostic performed to support the policy provided in-depth information about the ASGM in the Southern Andes, an area known for its mining tradition but with an unclear demographic. Drawing from planetGOLD survey data, the vernacular mining practices of *pallaqueras*, *cachorreros* and *acopiadores* were registered in a national policy.¹²

Gender-based differentiation was included for the first time in a national mining policy. Women's participation figures were estimated based on REINFO and the National Registry of Gold Selectors. planetGOLD Peru's approach to promote gender equity in ASGM was important in supporting this.

The inclusion of gender differentiation also meant that it was important to convene *pallaqueras* representatives in the policy formulation. Through focus groups, participatory and informative workshops, and interviews, *pallaqueras* input was included in the definition of a desired future scenario, the selection of alternatives and the identification of achievement standards.

Partners and Key Stakeholders

The main participants of the initiative included the planetGOLD team, the DGFM, and an expert team, which led the process through a consultancy, and allied organizations. Key stakeholders and their participation spaces include:

- In technical workshops:
 - Ministry of the Interior (MININTER)
 - Ministry of the Environment (MINAM).
 - Ministry of Economy and Finances (MEF),
 - Ministry of Agrarian Development and Irrigation (MIDAGRI)

¹¹ Regional Governments are responsible to implement the formalization in their respective jurisdiction in Peru.

¹² The diagnostic was published with the National Policy. C.f. footnote 7, pg. 10.

- Ministry of Labor (MINTRA)
- Ministry of Production (PRODUCE)
- Ministry of Foreign Affairs (REE)
- Ministry of Development and Social Inclusion (MIDIS)
- Taxing Authority (SUNAT)
- Public Registry Authority (SUNARP)
- Mining federations
- International cooperation agencies
- Civil society
- Academia.
- In macro-regional workshops:
 - 343 miners
 - Regional formalization offices (DREM/ GREM)¹³
 - Regional experts.
- In focus groups: mining federations.
- In a forum: general public.

Main Activities and Outputs/Achievements

The main outcome of this initiative was the publication of the National Multisectoral Policy for Artisanal and Small – Scale Mining (2021 – 2030).

Main governance and regulations

- New policy: Multisectoral National Policy for Artisanal and Small-Scale Mining.¹⁴ This is an “umbrella” ASM policy that encompasses formalization, trade, technological upgrade, and mercury contamination awareness activities. planetGOLD Peru contributed to the formulation of other regulation proposals in line with this policy (see the third bullet point below)
- The National Policy guidelines were simultaneously co-developed with the update of the Minamata National Action Plan. Some of the key actions both documents share include: the implementation of a financial mechanism (mining fund), proposing a national certification “Oro formal, oro peruano”, and the development of a gold traceability model. planetGOLD Peru supported the introduction of these shared items to reinforce the centrality of financial

¹³ Formalization focal points for regional authorities but depending on the Ministry of Mining and Energy (MINEM).

¹⁴ Decreto Supremo No. 016-2022-EM. (November 25, 2022). Aprueba la Política Nacional Multisectorial para la Pequeña Minería y Minería Artesanal and 2030.

mechanisms as part of ASGM policies.¹⁵

- The project also provided technical assistance in the regulation of the National Registry of Gold Traders and Processors (REPCO, in Spanish), aimed to support traceability in line with the National Policy and the Minamata National Action Plan. This regulation provided a digital protocol for the registration of gold transactions plus the development of an online application to increase its transparency.^{16, 17}

Although both the Minamata National Action Plan and the REPCO regulation remain to be enacted, they illustrate cross-sectoral efforts to mainstream ASGM policymaking through harmonization and convergence.

Communication Strategy

The National Policy was part of interconnected communication strategies. The policy formulation process itself created a communication space among stakeholders. This was central to co-shape policy from the bottom up. planetGOLD field contacts and liaison with local government offices was central in this phase. One key strength of planetGOLD Peru was a respectful engagement with local stakeholders, which was useful to encourage them to participate in forums and other policy participation spaces.

Another dimension of the communication strategy entailed close collaboration with MINEM communication offices and the support of allied organizations to amplify the call for stakeholder participation and policy dissemination.¹⁸

Monitoring and Learning

Assisting in the development of the National Policy was not originally part of the scope of work for the planetGOLD Peru but it was quickly incorporated within planetGOLD Peru's activities portfolio. This suggests that the team reacted in a timely way to the emerging priorities of allied partners and was able to adapt accordingly.

Three events delayed the process: (a) the COVID-19 lockdown restrictions, (b) difficulties in

¹⁵ Resolución Ministerial No. 020-2024-MINAM. (January 30, 2024). Decreto Supremo que aprueba el Plan de Acción Nacional para la Minería de Oro Artesanal y de Pequeña Escala en el Perú, en el marco de la implementación del Convenio de Minamata sobre el Mercurio

¹⁶ planetGOLD Peru won a competitive award, the [Artisanal Mining Grand Challenge: The Amazon](#), to develop a digital application for gold traceability.

¹⁷ Resolución Ministerial No. 190-2021-MINEM/DM. (June 28, 2021). Proyecto de Decreto Supremo que establece disposiciones reglamentarias para el Registro Especial de Comercializadores y Procesadores de Oro-RECPO

¹⁸ Eg. [Swiss Better Gold](#), [Solidaridad](#).

the identification of local stakeholders, and (c) political tensions preventing the timely publication after the final draft was submitted. Regardless, the National Policy was finalized in two years and was published within three years, which is shorter than CEPLAN policymaking estimate (4 years).

On the other hand, the REPCO regulation proposal was formulated rapidly but was not adopted as fast. Changes in DGFM leadership may have impacted the process.

Formalization Intervention 2: Identification of high priority ASGM organizations for a more precise formalization assistance approach

ASGM operators are highly heterogeneous, depicting different degrees of compliance under formalization regulations. This means that a single solutions package may not apply for all ASGM operators. The planetGOLD Peru project's ASGM categorization tool provided an easy way to identify operators according to their fulfillment of key formalization requirements. This categorization informed intervention strategies with targeted support packages.

Description of the Intervention

In this intervention, the planetGOLD Peru project (a) designed and applied an ASGM operator categorization tool according to the fulfillment of formalization criteria, and (b) developed a holistic approach to support local operators to complete the formalization process.

The first step responded to policymakers' and program officers' need to focus formalization implementation. Past initiatives considered various criteria to define priority groups, including experience in the area, trust between miners and project officers, donor priorities, mining practices (underground vs alluvial), among others. None of these, however, centered on the fulfillment of formalization criteria, and understandably so because formalization legislation has experienced significant changes over the past two decades.

Local DGFM and planetGOLD Peru field officers shared similar experiences working with local miners. They raised awareness of the need to develop objective criteria to select target groups. While planetGOLD Peru's project design aimed to support formalization of at least 12 operations in target provinces selected for their representativeness of ASGM operations, there was no method specified by which the project should select the communities to work with.

planetGOLD Peru presented a categorization tool centered on two formalization

requirements that miners often fail to fulfill: mining rights tenure and surface land tenure/ use permit. The permutations of these requirements configure four ASGM operator categories. The typology was then applied to REINFO to analyze the distribution of operators and bring forward typical problems each sub-category faces to complete the formalization process.

Chart 1. ASGM categories according to fulfillment of formalization requirements.

Formalization requirements	Category I	Category II	Category III	Category IV
Mining rights	YES	YES	NO	NO
Surface land	YES	NO	YES	NO
Key actions	Post-formalization technical assistance	Settlement with surface land rights holders	Settlement with mining rights holders, including LSM and ASM	Three-party agreement making

In the second step, the categorization tool was used as a grid to funnel assistance and resources for ASGM operators closer to completing the formalization process, thus aiding the selection of quick win cases (Categories I and II). These were crucial to provide concrete examples of successful formalization and encourage other operators to follow the same path.

With the benefit of hindsight, it is possible to identify three phases that accompanied each intervention. They are described in the following chart:

Chart 2. Intervention phases.

Intervention phases	Description
Phase I: Pre-intervention	All interventions started with an agreement between ASGM operators willing to receive formalization assistance and planetGOLD Peru. Key documents are: <ul style="list-style-type: none"> • Letter of commitment, specifying forms of assistance and committed resources. • Working plan, including a timeline for goals.
Phase II: Intervention	Interventions focused on three areas: formalization requirements, technological upgrade and financial inclusion. These areas were worked on simultaneously and in attunement with ASGM operators pressing needs. The intervention philosophy is described in the Monitoring and Learning section below.
Phase III: Post-intervention	Post-formalization follow-up. Regular visits to check continued progress and offering workshops for skills improvement.

Target Areas and Target Groups

The planetGOLD Peru project design focused on the Puno, Arequipa and Piura provinces, aiming to support 12 mining communities. planetGOLD Peru applied the categorization tool in these areas and chose to work with a mixed set, where 50% belonged to Category 1 and 50% to categories 2 and 3.

Category I ASGM operators were small businesses registered before the taxing authority (SUNAT) and the REINFO. Most of these cases were found in Arequipa, a province targeted by previous development organizations with ASM support programs.¹⁹

Categories II and III ASGM operators were also registered before SUNAT and REINFO, however, lacked tenure or permit over surface land or the subsurface. These cases were often found in Puno and Piura. In Puno around 12 500 formalization applications are filed, making it a challenging case because local authorities are not well equipped in law enforcement and regulation. Mining conflicts and the proximity to Bolivia, an important gold and mercury trade route, make this a challenging area.²⁰

Piura, on the other hand, came to prominence over the past years due to the influence of criminal organizations. Both “hotspots” presented singular challenges due to in-situ conditions.

Partners and Key Stakeholders

Key partners and stakeholders for this intervention included:

- ASGM operators: small-scale formal and informal miners, workers, and beneficiation plants
- Local DGFM officers: government authorities regulating ASM locally.
- Consultancy teams: Lawyers, engineers, and environmental science experts, providing formalization assistance to ASGM operators.

Main Activities and Outputs/Achievements

The project successfully supported 32 ASGM operators in their formalization processes. The main activities vary according to the ASGM operator category:

- **Category I.** Support centered on upgrading processing practices, health and safety training, developing business plans, and ensuring the coexistence between surface and subsurface right holders, as well as mining operators.

¹⁹ E.g. [GAMA Project](#) (Gestión Ambiental en la Minería Artesanal).

²⁰ PNUD. (2022). [Análisis social, económico, minero y ambiental de los distritos de Ananea y Cojata](#). PNUD: Puno. This publication is also a planetGOLD Peru collaboration.

- **Categories II and III.** Support centered on providing legal assistance for mining rights and legal use of surface land. Consultancy teams aided in developing operations plans and environmental safeguards to regularize mining permits. For this, baseline reports were developed, comprehensively documenting the status of mining operations, as well as social, environmental, and technological conditions.²¹

Communication Strategy

The most important communication component in this intervention was through one-to-one contact with miners and mining entities selected. Miners required timely and in-person demonstration. The COVID-19 pandemic complicated this approach. Although the communications team attempted to maintain close contact with mining communities through podcasts and audiovisual material,²² formalization engagement resumed only after the Peruvian government lifted lockdown restrictions.

Monitoring and Learning

One of the most important, if not the most important, necessary conditions to work with ASGM operators is gaining their trust. Miners distrust official programs for many reasons, including abandonment after the project cycle ends, fear of being reported to the authorities, and suspicion about the efficiency of new technologies, among others. The team sorted out these ideas by implementing an in-situ, walking together, learning-through-practice approach.

Province coordinators worked closely with mining communities over a 3-year period and remained a crucial focal point to anchor other interventions (e.g. introduction of mercury-free technologies). These coordinators participated in activities well beyond mining, such as local festivals, which helped develop familiarity with local communities and progressively build trust. Instead of relying solely on the demonstration of high-performance ASGM operations, coordinators encouraged miners to take action throughout the transformation of their activities and “*aprender haciendo*” (“learning by doing”). Workshops with ASGM operators were crucial for peer learning.

Increasing visibility and supporting women in ASGM, the *pallaqueras*

Pallaqueras are women who work at an artisanal level to select ore from waste materials accumulated by the slopes of underground mining. *Pallaqueras* are often found in mining communities, however, they have not been recognized in ASGM policy, surveys, nor in public opinion in general. planetGOLD Peru supported the generation of evidence about

²¹ E.g. planetGOLD. (2023, July). [Informe Técnico sobre la OMB Agustin Pachari Flores](#). Report.

²² E.g. planetGOLD. (2019). [Recomendaciones para una MAPE sin COVID-19](#).

pallaqueo, the creation of *pallaqueras* associations and gender-sensitive policymaking.

Description of Intervention

planetGOLD Peru's project design included the goal of improving gender equity in the ASGM sector. Gender mainstreaming was envisaged as a cross-programmatic set of actions that cut across formalization, technological upgrades, and financial mechanism components. In that way, planetGOLD Peru became the first to consider a gender perspective on ASGM in Peru explicitly.

Gender equity in mining, in general, is slowly progressing. Concerns around gender equity in employment entered policy discussions with the opening of a Women in Mining (WIM) Chapter in Peru in 2016.²³ Notwithstanding the relevance of this initiative to mainstream gender principles in the mining sector in general, it is strongly focused on the case of large-scale mining.

One of WIM's first actions was discussing the need for gender-differentiated data in the mining sector with industry and government actors. This is one of the reasons why the Mining Yearbook²⁴ now includes gender-differentiated employment data. However, this information does not estimate gender-disaggregated data for ASM employment.²⁵ Moreover, *pallaqueras* are not even considered under the mining category. Their work remained unregulated and, thus, invisible.

planetGOLD Peru carried out the first initiative to systematically register information about *pallaqueras*, support *pallaqueras* associations, and develop gender-sensitive policymaking.

Partners and Key Stakeholders

The focus areas were Puno, Arequipa and Piura. Key target groups included *pallaqueras* and other women working in ASM.

planetGOLD Peru assumed the leadership role in the gender equity intervention. The main activities were performed in cooperation with MINAM and MINEM, particularly with the first institution for research activities.

The program collaborated with Solidaridad to support policy discussions. Solidaridad, a Netherlands-based NGO, has been working for decades on ASGM issues in Peru and in particular has been working with *pallaqueras* in Puno since 2018. The synergies between

²³ An international industry initiative for gender equity. See: <https://wimperu.org/>

²⁴ The official annual compilation of key mining statistics.

²⁵ Current statistics record employment by a mining company or a contractor.

planetGOLD and Solidaridad enabled the creation of regional forums for *pallaqueo* and women in ASGM, ultimately encouraging Solidaridad to continue with the gender equity and ASGM initiative on a national level.

Main Activities and Outputs/ Achievements

Although planetGOLD Peru did not originally plan a step-by-step approach, four key steps in the work with *pallaqueras* can be identified, with the benefit of hindsight:

- **Step 1: Researching gender inequities in ASGM.** In a study that systematically characterizes *pallaqueras* for the first time,²⁶ planetGOLD Peru reported findings from ten provinces. The study was based on surveys, in-depth interviews, focus groups and life stories. Key findings highlight that *pallaqueras* are the group most exposed to domestic violence, the most burdened with housework and care roles, and the least knowledgeable of risks provoked by mercury exposure.
- **Step 2: Supporting *pallaqueras* organizations.** Three *pallaqueras* organizations were officially created and received training in capacity development, leadership, and business modeling.
- **Step 3: Applying gender equity principles in ASGM policymaking.**²⁷ planetGOLD Peru aided with a “gender in ASM” workplan, aimed at inter-sectoral cooperation to mainstream the gender approach in ASM policies. The plan’s key components are:
 - Raising awareness and capacity development concerning the gender approach and ASM.
 - Data generation and knowledge management.
 - Capacity development of organizations of women in ASM.
- **Step 4: Enrolling allies to carry on with efforts towards gender-sensitive ASM policymaking.** By working with Solidaridad, planetGOLD Peru ensured that ongoing initiatives continue after the project completion.

Main governance and regulations

The main regulation goal was the recognition of *pallaqueo* so that women can work legally and sell their ore at competitive prices.²⁸ Therefore, the desired outcome was a high-level regulation (e.g. a decree) that identifies *pallaqueras* as part of the ASM policy framework. So far, the program has aided DGFM in drafting a gender plan, which should culminate with a regulation definition.

planetGOLD collaborated with partner Solidaridad to support the creation of a National

²⁶ UNDP & MINAM (planetGOLD Peru project). (2022). [Women and men of gold: Challenges towards gender equity in artisanal mining and small mining](#). Lima: UNDP.

²⁷ DGFM. (2023, December). [Plan de Género para la Pequeña Minería y Minería Artesanal 2023 – 2025](#).

²⁸ Currently, they sell at 30% or 40% of legal ore prices.

Women in ASM Network (RNM-MAPE), which includes more than 400 women.²⁹ Their yearly convention and capacity development have been contemplated in program initiatives, partner priorities, and government plans.

Communication Strategy

If ASGM in Peru is not a particularly interesting topic for the media, unless it pertains to associations with informality and illegality, the role of women in the sector even less attractive. The communication strategy hinged on planetGOLD Peru reporting of activities and publications in the website,³⁰ as well as specific collaborations with allied organizations.

planetGold Peru reached out to *pallaqueras'* associations and ensured they participated in the ASM National Policy process. The program also made sure that their perspectives were recorded and integrated into the policy problem analysis. *Pallaqueras* were also invited to regional events where the National Policy was presented.

Monitoring and Learning

This intervention was, in many ways, unprecedented. For team members, “it was like walking in the dark,” because of the lack of background information and clear details about the target population. Therefore, a key monitoring and learning outcome is that it is important to develop in-depth knowledge about the said group, its dynamics, and its characteristics to define informed indicators.

The team found useful that gender mainstreaming was considered in the project design since it was not a high-profile political issue in national policymaking, and therefore, regarded as one of little importance. By invoking the authority of the project design, as approved by the funder, the team opened spaces for dialogue to define the national gender in ASM strategy.

Pallaqueras and women in ASM are often relegated to the background of ASM organizations' meetings. Creating separate spaces for their participation (e.g. the yearly meeting) ensured they will have a safe space to express themselves.

²⁹ Solidaridad. (2024, July 17). [Red Nacional de Mujeres MAPE se reúne con más de 250 mujeres mineras de la región Puno.](#)

³⁰ E.g. Guzman & Lazarte. (2022, March 9). [Violence against women in artisanal mining.](#) planetGOLD.

4 Cross-cutting Issues

Indigenous Peoples

Indigenous peoples were not identified within the target provinces, nor were they found in communities of formalization interventions. Nonetheless, they were identified by applying the categorization tool under type III (surface land ownership but not mining rights tenure). An unclear number of peasant and native communities in Peru have started the formalization process.³¹ At the same time, another group does not wish to reach a settlement with miners who are considered as invaders of traditional land.

Future initiatives should approach indigenous groups for more nuanced guidelines concerning their variety of perspectives before formalization.

Environmental Issues (Beyond Mercury) and Climate Change Issues

Alluvial mining is found not only in the Amazon but in the glaciers of Puno. This practice is associated with unnecessary deforestation, water reserves loss, and geomorphological changes. Specific regulations for alluvial ASM are needed.

Another environmental problem the project did not address is the use of cyanide in informal beneficiation plants. Cyanide is a permitted substance in mining, however, plants do not always use it safely or with the best technologies. In particular, future interventions may consider focusing on tailings management adequate for small-scale plants.

5 Findings, Experiences and Lessons Learned

Lessons learned

To the extent that formalization activities hinge upon the cooperation with various external actors, organizations and institutions, achieving outcomes is highly contingent upon several external factors. This is a particularly salient condition in Peru. Since planetGOLD Peru started, the team had to liaise with new ministerial leadership in the

³¹ Arista, F. (2024, September 17). [Del dato a la acción: estrategia “basada en datos” para promover la formalización de la minería artesanal en Perú](#). planetGOLD.

mining sector multiple times, adapt to the COVID-19 sanitary restrictions,³² and deal with social unrest in mining communities.

Key learning points from execution of the project include the following:

- Inter-ministerial cooperation is necessary for complex policy formulation. Although the National Policy was steered by MINEM, MINAM and other sectors were necessary to formulate an integral and transformational ASM perspective.
- Local stakeholder engagement is necessary for grounded policy formulation and validation of policy guidelines.
- A gender perspective in policy formulation enlightens the specific needs of women in ASGM.
- Overall, project implementation must remain flexible and attuned to country-specific dynamics. This attunement is important to identify opportunity windows that match project and country-specific priorities.

Broader Implication for Formalization

Before planetGOLD Peru, formalization lacked a national ASM policy upon which it could be based. The project helped Peruvian regulators and policymaking to design a cross-sectoral and integral approach to formalization by covering themes beyond the acquisition of mining rights. Such issues include working with a value chain perspective to include mid-stream actors in formalization sustainability and including actions for gender-sensitive approaches.

The project brought to formalization discussions new perspectives and approaches in Peruvian regulation. These actions may slowly change common understandings about formalization, how it is understood and the extent to which a multi-angle perspective may be beneficial to rethink formalization policy overall.

Specific Factors for Success

A number of factors/approaches were noted that supported the achievement of project success:

- Categorizing and defining target groups with sound criteria to target those most likely to benefit.
- Promoting bottom-up policy framing and definition of solutions and creating opening meaningful participation spaces.
- In situ, hands-on support and fostering a peer-to-peer learning environment.

³² planetGOLD Perú. (2020). [Análisis de la presencia del COVID-19 en la MAPE de Arequipa, Piura y Puno](#). Reporte – Junio/ Julio 2020.

- Articulating messages that combine environmental sustainability with business efficiency.
- Leveraging program commitments to change national-level regulation and policy.
- Aligning goals with similar programs and enrolling their cooperation as part of nationwide initiatives to guarantee their continuity.

Long-term Sustainability

ASM formalization is a hotly debated policy in Peru, amidst authorities transitions and general political instability. planetGOLD Peru strived to provide a sense of continuity amidst ongoing changes in areas of wide-ranging consensus and that cut across many policy guidelines, national plans and national actions. However, initiatives like planetGOLD Peru may still be vulnerable to the ebb and flow of legislation and policymaking (e.g. a new formalization deadline has been kicked forward).

This suggests that lasting changes are to be found in the collaboration practice *per se* and the networks of actors enrolled in ASM transformation beyond the government. By aligning agendas and sharing goals, the multiplication of governance spaces and civil vigilance may help to maintain progress that has been made under the project.

Recommendations for Future Interventions

The experience of planetGOLD Peru suggests a number of observations and lessons for future interventions:

- The process matters as much as the outcome. Creating meaningful engagement and participation and obtaining key input from stakeholders and collaborators seeds trust in the dynamic, enhances credibility, and supports program goals.
- Learning when to stop insisting is as important as learning when to proceed. Many regulation outcomes depend on the government and follow a timeline attuned to political and policy dynamics. Understanding that program goals do not have to follow the same rhythm helps to understand other possibilities beyond the official policy arena (e.g. including new collaborators).
- Producing evidence and measurable goals is a centerpiece of formalization implementation success.



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