

# **MINUTES OF THE MEETING BETWEEN THE MSG SELECT COMMITTEE ON GOLD DATA AND THE URA CUSTOMS OFFICE HELD ON MONDAY, 6TH OCTOBER 2025 AT ENTEBBE INTERNATIONAL AIRPORT**

## **1.0 Attendance List**

### **Members Present:**

1. Mr. Paul Twebaze – ACODE-CSO Constituency Representative (**Chair**)
2. Mr. Siragi Magara – Oxfam -CSO Constituency Representative
3. Mr. Peter Rumanzi – BOU -Government Constituency Representative
4. Mr. David Sebagala – DGSM -Government Constituency Representative
5. Mr. Lawrence Muwonge – URA- Government Constituency Representative
6. Ms. Gillian Lawino – MoFPED -UGEITI Technical Support Officer

### **URA Customs Department:**

1. Mr. Kaija Patrick
2. Mr. Katende Emmanuel
3. Ms. Agaba Edith-Manager customs
4. Mr. Ssekandi Joseph
5. Mr. Pachu Chris

### **Apologies:**

1. Mr. John Bosco Bukya – Industry Constituency Representative

### **In Attendance (UGEITI Secretariat):**

1. Mr. Dan Denis Agaba – Statistician/Secretary

## **2.0 Introduction**

The chair informed participants that the MSG had constituted a Select Committee to conduct a field visit to Entebbe Airport for purposes of understanding the process of gold exportation at the customs office.

The meeting of Monday, 6th October 2025 was convened to engage with representatives from the Uganda Revenue Authority (URA) Customs Department and deliberate on the existing gaps in gold data reporting, import/export controls, and legal compliance in the sector.

### **3.0 Matters Discussed**

#### **3.1 Discrepancies in gold import and export data**

Members observed a mismatch between recorded gold imports and exports, with exports reflecting higher values, suggesting possible smuggling.

#### **3.2 Risk of regional conflict**

DGSM noted that unresolved discrepancies could lead to regional disputes, citing an ICGR Audit Committee observation regarding tensions between Rwanda and the DRC over conflict minerals.

#### **3.3 Absence of company-level data**

Members expressed concern over the absence of declaration data from gold importing and exporting companies. URA clarified that there was no law prohibiting mineral importation within the East African region.

#### **3.4 Legality of trade and conflict minerals**

Members agreed that trade in minerals, including gold, should not be banned, provided it was conducted legally and in compliance with national regulations.

#### **3.5 Source of gold and licensing requirements**

Members questioned the source of gold used by companies in the absence of clear records. URA noted that refineries operated under a “manufacture under bond” licence. However, DGSM emphasized that under the Mining and Minerals Act, 2022, companies were required to obtain smelting and refining licences, not operate solely under bond arrangements.

#### **3.6 Customs declaration and verification**

URA informed the meeting that companies made customs declarations and gold was verified with security agencies. It was further noted that only companies, and not individuals, typically exported gold, although current law did not prohibit individuals from doing so.

#### **3.7 Handling of individual exporters**

Concerns were raised regarding potential fraud, as individuals seeking to export gold were often referred directly to the Commissioner Customs. Members recommended streamlining this process.

#### **3.8 Refinery operations and possible leakages**

The meeting was informed that Euro Gold Refinery reportedly only smelted gold and returned it to owners without clear accountability, raising suspicion of potential leakages and smuggling.

### 3.9 Weak airport screening

It was observed that due to gold's small size and value, smuggling was possible, particularly where screening was not robust, such as at passenger terminals managed by Immigration and Aviation Security, which were outside URA's direct control. Members advised URA to enhance coordination with these agencies.

### 3.10 Role of mineral police

It was noted that cases involving smuggling and documentation irregularities were handled by the Mineral Police.

### 3.11 Import permit compliance

Members were informed that some importers bypassed legal procedures requiring customs documentation before obtaining import permits. Additionally, although the law required a 10% import permit fee, some individuals reportedly bypassed this requirement through presidential intervention, which was considered a policy rather than a procedural issue.

### 3.12 Data sharing and gatekeeping role of URA

Members emphasized that the law assigned URA a gatekeeping role for data sharing through customs, which was not being fully enforced.

### 3.13 Need for traceability

It was recommended that all entities handling gold maintain documentation indicating the source of purchase to improve accountability and reconciliation.

### 3.14 Lack of import fees data sharing

The Committee was informed that gold imports were not subjected to import fees and this information was not being shared with MEMD for reconciliation with production figures.

## **4.0 Recommendations and Way Forward**

1. Strengthen record management: Gold production, import, and export data should be streamlined and harmonized among URA, DGSM, UBOS, and security agencies.
2. Enforce the Mining and Minerals Act, 2022: Refining and smelting should only be conducted by licensed entities, not solely under bond arrangements.

3. Strengthen institutional coordination: URA, DGSM, security agencies, and the Mineral Police should enhance collaboration to detect and prevent smuggling.
4. Mandatory documentation: All importers/exporters should provide proof of origin prior to import or export, supported by amended regulations.
5. Pre-import documentation: Import certificates should be obtained before shipment, in line with amended regulatory requirements.
6. Stakeholder engagement: Key actors, including refiners, traders, aviation authorities, CAA, security agencies, and small traders, should be engaged to ensure compliance and curb smuggling.
7. Screening enhancement: Airport and border screening mechanisms should be reviewed to enhance detection capabilities.

## **5.0 Conclusion**

The Chairperson thanked members for their active participation and emphasized the importance of the upcoming field visit to Entebbe International Airport in deepening understanding of the gold export process and informing future policy recommendations.

The meeting adjourned at 2:01 p.m