



MINISTÉRIO PÚBLICO FEDERAL • FEDERAL PROSECUTION SERVICE OF BRAZIL

Illegal mining in the Amazon

The structural work of the Federal Prosecution
Service and its leading cases

Offices specialized in illegal mining • 2023 to 2026

MPF
Ministério Público Federal

Cover: Amazonian river in a mining area. MPF archive.



INTRODUCTION

About this report

This report presents the work of the offices of the Federal Prosecution Service (Ministério Público Federal, MPF) that specialize in illegal mining, from the start of their activities in August 2023 to October 2026.

The document covers the structural initiatives, which seek to correct the regulatory and administrative failures that allow clandestine garimpo to continue, and the leading civil and criminal cases. Garimpo is the Brazilian term for artisanal and small-scale mining, which in the Amazon is now largely mechanized. The report follows the links in the economic chain of the ore, from financing and inputs through to sale, because experience to date indicates that enforcement concentrated at the point of extraction produces short-lived results.

Each chapter describes the problem addressed, the measures taken by the Federal Prosecution Service and the stage reached in the corresponding court case or proceeding. The final chapters record appearances at public hearings, before international bodies and in other settings where the institution was represented, and the annex lists the main cases mentioned in the text.

The information was drawn from court filings, judicial decisions and press releases published on the website of the Federal Prosecution Service, which are listed at the end of each chapter. Cases under seal were not included, and individuals under investigation or facing charges are not identified. In pending cases, the facts are described as alleged by the Federal Prosecution Service, without prejudice to the adversarial process and the presumption of innocence.

For each case, the procedural status shown reflects the latest information available in the sources consulted, with a cut-off date of 7 October 2026. Decisions issued after that date, or not yet made public, may have changed the stage of some cases, which is why case numbers are given for direct consultation.

How to read this report. The case cards set out the identifying details of each action. The yellow boxes summarize the requests made and the orders issued by the courts. The QR codes and the links at the end of each chapter lead to the corresponding press releases on the website of the Federal Prosecution Service. In the penalties cited, detention (detenção) is the lighter and imprisonment (reclusão) the heavier of the two custodial penalties of Brazilian law.



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REFERENCE

Acronyms

ANA	National Water and Sanitation Agency (Agência Nacional de Águas e Saneamento Básico)
ANAC	National Civil Aviation Agency (Agência Nacional de Aviação Civil)
ANM	National Mining Agency (Agência Nacional de Mineração)
ANP	National Agency of Petroleum, Natural Gas and Biofuels (Agência Nacional do Petróleo, Gás Natural e Biocombustíveis)
ANPR	National Association of Federal Prosecutors (Associação Nacional dos Procuradores da República)
ANTAQ	National Waterway Transport Agency (Agência Nacional de Transportes Aquaviários)
CENSIPAM	Management and Operations Centre of the Amazon Protection System (Centro Gestor e Operacional do Sistema de Proteção da Amazônia)
CGU	Office of the Comptroller General (Controladoria-Geral da União)
FEMARH	Roraima State Foundation for the Environment and Water Resources (Fundação Estadual do Meio Ambiente e Recursos Hídricos de Roraima)
FUNAI	National Foundation for Indigenous Peoples (Fundação Nacional dos Povos Indígenas)
GAECO	Special Action Group against Organized Crime (Grupo de Atuação Especial de Combate ao Crime Organizado)
IBAMA	Brazilian Institute of Environment and Renewable Natural Resources (Instituto Brasileiro do Meio Ambiente e dos Recursos Naturais Renováveis)
ICMBio	Chico Mendes Institute for Biodiversity Conservation (Instituto Chico Mendes de Conservação da Biodiversidade)
IPAAM	Amazonas Environmental Protection Institute (Instituto de Proteção Ambiental do Amazonas)
MPF	Federal Prosecution Service (Ministério Público Federal)
OECD	Organisation for Economic Co-operation and Development
PLG	Artisanal mining permit (permissão de lavra garimpeira)
UNICRI	United Nations Interregional Crime and Justice Research Institute
UNODC	United Nations Office on Drugs and Crime



1

The Federal Prosecution Service and the specialized offices

The 1988 Constitution placed the Prosecution Service outside the three branches of government and entrusted it with public criminal prosecution and with the protection of the environment, public assets and the rights of Indigenous peoples. The specialization of offices in illegal mining brings those functions together in the same operational units.

Constitutional profile

Under article 127 of the Constitution, the Prosecution Service in Brazil is a permanent institution, essential to the judicial function of the State, charged with defending the legal order, the democratic system, social interests and inalienable individual interests. It is not part of the Executive, the Legislature or the Judiciary, and its members enjoy the same guarantees as judges, namely life tenure and protection against removal from post and against reduction of pay. Each prosecutor acts independently and is not subject to hierarchical direction as to the content of his or her submissions.

It falls to the Federal Prosecution Service to act before the federal courts. Mining matters come within its remit because mineral resources, including those in the subsoil, belong to the Union (the federal government) under articles 20, IX, and 176 of the Constitution, so that extraction without an authorizing title harms federal property as well as the environment. For the same reason, the federal courts have jurisdiction over related offences, such as laundering the proceeds of the ore.

Legal instruments

In criminal matters, the Federal Prosecution Service has exclusive authority to bring public criminal prosecutions. Investigations are, as a rule, conducted by the Federal Police under the external oversight of the Prosecution Service, which may also open an investigative proceeding of its own. For less serious offences, the law allows negotiated outcomes such as the non-prosecution agreement, which has been used in illegal mining cases, with assets handed over to the enforcement agencies.



On the civil side, the institution has at its disposal the civil inquiry, the recommendation, the conduct adjustment agreement (a form of consent agreement) and the public civil action. These instruments reach private parties and public authorities alike, which makes it possible to sue regulatory agencies and enforcement bodies when the failure is regulatory or administrative. In such cases the action takes on a structural character, since the claim seeks the reorganization of a policy or a control routine, with the court monitoring compliance.

INSTRUMENTS USED AGAINST ILLEGAL MINING

	Criminal matters	Civil matters
Investigation	Police inquiry, under external oversight, and criminal investigative proceeding	Civil inquiry and administrative monitoring proceeding
Negotiated outcome	Non-prosecution agreement	Recommendation and conduct adjustment agreement
Court action	Indictment, provisional measures against assets and criminal proceedings	Public civil action for reparation, for structural reform or to hold legal entities liable
Result sought	Punishment of those responsible and forfeiture of the proceeds of crime	Reparation of the damage and correction of the failure that made it possible

Specialized offices

The offices with specialized responsibility for illegal mining began operating in August 2023. Specialization brings together in the same operational units the criminal prosecution of mining and related offences and the corresponding civil protection of collective interests, on a regional basis in the Amazon. In cases involving criminal organizations, the offices act jointly with the Special Action Groups against Organized Crime (GAECO) of the Federal Prosecution Service.

This concentration allows the evidence gathered in the criminal investigation to support the civil action for reparation and the action to hold liable the legal entities that benefited. Recurring problems identified in the cases, such as the lack of regulatory criteria or of controls on inputs, are in turn converted into recommendations and structural actions. The following chapters show this move from the individual case to the measure of general application on several fronts.

National coordination takes place within the 4th Chamber for Coordination and Review, the Federal Prosecution Service's body for environmental and cultural heritage matters. A coordination office dedicated to illegal garimpo, attached to that Chamber, is responsible for preparing technical notes addressed to the National Congress and the Executive and for circulating among other prosecutors the legal arguments and model filings developed in individual cases. Relations with foreign authorities and bodies are conducted through the International Cooperation Secretariat of the Prosecutor General's Office.



Results in figures

Internal systems make it possible to consolidate, for the state of Roraima, the case output since specialization. Between 21 August 2023 and 9 April 2026, the Federal Prosecution Service filed 205 indictments for offences linked to illegal garimpo in that state, and the federal courts handed down 76 judgments wholly or partly in favour of the prosecution. Over the same period, seven cases were closed because the limitation period had expired and nineteen for other reasons.

INDICTMENTS AND JUDGMENTS IN RORAIMA AFTER SPECIALIZATION

Activity	2023*	2024	2025	2026**	Total
Indictments filed	18	98	70	19	205
Favourable judgments	12	10	33	11	66
Partly favourable judgments	0	3	7	0	10

* From 21 August to 31 December 2023. ** Until 9 April 2026. Source: Extractus system of the Federal Prosecution Service.



2

Illegal mining in the Amazon

The garimpo now operating in the Amazon has little of the manual labour its name suggests. It is organized as a business, with financiers, heavy machinery, air and river logistics and stable sales channels, and that structure shapes how the Federal Prosecution Service allocates its work.



Scale

According to MapBiomas, in 2022 the Amazon had about 241,000 hectares under garimpo, equivalent to 92% of the national total. Gold accounts for most of that area, followed by cassiterite, the ore from which tin is obtained. Between 2016 and 2022, the area under garimpo inside Indigenous lands, where no mining title can be granted, grew by 361%.

Proximity to water aggravates the effects of the activity, since 77% of the garimpo areas in the region lie less than 500 metres from rivers, lakes and streams. In economic terms, a survey by Instituto Escolhas identified 229 tonnes of gold with signs of illegality traded in the country between 2015 and 2020, almost half of national production in the period. The price of the metal, above R\$ 700 per gram since 2025, increases the incentive for clandestine extraction.

241,000 ha under garimpo in the Amazon in 2022 MapBiomas	92% of the country's garimpo area is in the Amazon MapBiomas	77% of that area lies less than 500 m from watercourses MapBiomas	229 t of gold with signs of illegality between 2015 and 2020 Instituto Escolhas
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Extraction methods

River mining relies on barges and dredges that churn up the bed and suck in the sediment, from which carpets fitted on board trap the gold particles. This method has historically been concentrated on the Madeira River and its tributaries, where hundreds of vessels may operate at the same time, and it uses equipment that can be worth as much as R\$ 15 million per unit.

On dry land, hydraulic excavators and pumps open pits and cut away banks, with extensive deforestation and the discharge of tailings into streams, a pattern common in Indigenous lands and protected areas. Lastly, there is lode mining, in which ore from rock veins is crushed and processed in tanks, sometimes with cyanide. This last model was identified in the Urupadi National Forest, in Amazonas, with daily production estimated at up to six kilograms of gold.



Mining area in Roraima, in a photograph released with the results of federal operations in the Yanomami Indigenous Land. Photo: Office of the Chief of Staff of the Presidency (Casa Civil), July 2024.

Mercury

In current practice, the processing of alluvial gold depends on metallic mercury. Added to the concentrate, the substance forms an amalgam with the gold. Subsequent burning evaporates part of the toxic metal, while the rest ends up in the soil and the rivers. An estimated 1.3 to 1.5 grams of mercury are used for each gram of gold recovered.

All of this input is of unlawful origin, since Brazil does not produce mercury and no company is authorized to import or sell the substance for mining purposes, as acknowledged by the Brazilian Institute of Environment and Renewable Natural Resources (IBAMA), the federal environmental agency. A study by Instituto Escolhas estimated at about 185 tonnes the mercury of unknown origin used in garimpos between 2018 and 2022, which entered the country along smuggling routes from Bolivia, Peru and Guyana.

As to the health effects, research led by the Oswaldo Cruz Foundation in partnership with other institutions found that 21.3% of the fish sold in seventeen municipalities in six Amazonian states show contamination above the limit of 0.5 micrograms per gram. In another study, 56% of the Yanomami women and children assessed in the community of Maturacá, in Amazonas, had the substance in their bodies.

The economics of garimpo

Clandestine extraction rests on a division of roles that investigations have identified time and again. Financiers and machinery owners contribute capital, dredges, excavators and aircraft and receive a percentage of production. At the other end, the workers keep the smallest share of the proceeds and, in some cases, are found in slave-like labour conditions, a situation in which they are victims.

Between the mine and the market come those who provide logistical support, supplying fuel, food, air and river freight and satellite internet, and the buyers, who



purchase the ore in the producing region. Entry into the formal economy takes place through mining titles, cooperatives and invoices that attribute a lawful origin to ore extracted in a prohibited area. That is why laundering of the proceeds of crime accompanies almost all the larger cases.

Public security studies also record the presence of factions linked to drug trafficking in the garimpo economy, a phenomenon that part of the literature calls eco-mafia. The Brazilian Forum on Public Security (Fórum Brasileiro de Segurança Pública) identified factions in 344 of the 772 municipalities of the Legal Amazon (nine states) in 2025, and investigations by the Federal Police and the Federal Prosecution Service point to the use of gold as a means of payment and to the sharing of routes, weapons and laundering structures.

How the work is organized

Against this background, the work was organized by link in the chain. Criminal liability for those who extract, transport and finance remains indispensable, but it is accompanied by measures aimed at inputs, logistics, documentation and the market, the points at which the activity depends on goods and services supplied by the formal economy. The diagram below summarizes this correspondence and serves as a guide to the chapters that follow.

THE ILLEGAL GARIMPO CHAIN AND THE RESPONSES UNDER WAY

					
Financing	Inputs	Logistics	Extraction	Documentation	Market
Capital, dredges, excavators and aircraft	Mercury, cyanide and fuel	Airstrips, vessels and satellite internet	Mining sites on rivers, Indigenous lands and protected areas	Mining titles, invoices and cooperatives	Smelters, purchasing institutions and exports
Asset measures in criminal cases Liability of legal entities Reparation actions	Rede sem Mercúrio project (Mercury-Free Network) Guajará-Mirim river port Oversight of aviation fuel	Action on aerodromes Agreement with Starlink Recommendation to the Navy	Structural action in Amazonas Territorial protection plans Indictments	Actions against the mining regulator Technical notes to Congress	Operation Forja de Hefesto Tin traceability

SOURCES OF THE DATA IN THIS CHAPTER

- [MapBiomas: the Amazon accounts for more than 90% of garimpo in Brazil](#)
- [MapBiomas: 77% of garimpo in the Amazon lies less than 500 metres from water](#)
- [Federal Prosecution Service: technical note calling for the repeal of the mercury decrees \(in Portuguese\)](#)
- [Federal Prosecution Service: how it fights crimes that threaten the Amazon \(in Portuguese\)](#)



3

State presence and mining regulation

Enforcement operations destroy equipment and halt mining for a time, but the activity recovers when the State's presence is intermittent and when sector rules leave room for the irregular use of mining titles. The measures in this chapter address those two points.



Structural action on garimpo in Amazonas

The proceeding that monitors garimpo in the state of Amazonas gathered information on the presence of dredges on the Madeira, Jandiatuba, Boia, Jutaí, Puruê and Abacaxis rivers. A flyover in July 2025 counted more than four hundred dredges on the Madeira River, on the stretch between Calama, in Rondônia, and Novo Aripuanã, in Amazonas. On the Puruê River, another survey found about two hundred vessels, some valued at more than R\$ 10 million.

The same material showed how quickly the activity returns after operations. In August 2024, Operation Prensa put 459 vessels out of action on the Madeira River, yet in the first days of January 2025 about 130 dredges were already back in place in the same sub-basin. Added to this is the shortage of staff at the environmental agencies. The state office of IBAMA, the federal environmental agency, reported that it had 26 federal environmental agents, all based in Manaus, for the entire territory of the state.

To hear the different sectors affected, the Federal Prosecution Service held public hearings on 6 and 7 October 2025, attended by environmental and security agencies, the Armed Forces, researchers, civil society organizations, Indigenous peoples and representatives of the miners (garimpeiros). The presentations dealt with mercury contamination in fish and in human samples, threats against community leaders and the economic dependence of municipalities such as Humaitá, where about 1,400 families live off the activity. A net-pen fish farming project was presented on that occasion as an alternative source of income, and the Federal Prosecution Service stated that its work targets illegal garimpo and does not oppose mining carried out with a title and a licence.

Fifteen federal and state recipients were then sent Recommendation No. 1/2025, of 7 November 2025. It proposed the creation of a situation room or unified command, modelled on the federal coordination centre in Roraima (Casa de Governo), the preparation of a calendar of joint operations for the following twelve months and a stronger State presence in the critical sub-basins.

After more than seven months without the measures being implemented, the Federal Prosecution Service filed a structural public civil action in July 2026. The complaint asks the court to recognize an unconstitutional state of affairs in the protection of the environment, public health and Indigenous peoples and to order a permanent system of coordination between federal and state bodies, under judicial supervision.



Press release on the
structural action (in
Portuguese)



STRUCTURAL PUBLIC CIVIL ACTION · ILLEGAL GARIMPO IN AMAZONAS	
CASE No. 1040474-23.2026.4.01.3200	COURT 7th Federal Environmental and Agrarian Court of Amazonas
DEFENDANTS The Union (the federal government), the State of Amazonas, IBAMA, ICMBio (the federal protected-areas agency), FUNAI (the federal agency for Indigenous peoples) and IPAAM (the Amazonas state environmental agency)	STATUS Request for interim relief pending (information as of August 2026)

MAIN REQUESTS

- As a matter of urgency, a permanent inter-agency coordination body within 60 days and an integrated calendar of operations within 90 days.
- A state plan against illegal garimpo within 180 days, with continuous sanctioning action by the environmental agencies and a protocol for arrests in flagrante delicto.
- Permanent field enforcement bases, within 12 months, in the Javari Valley and on the Madeira, Japurá, Puruê and Abacaxis rivers.
- Plans for staffing and logistics, and judicial monitoring with quarterly reports and half-yearly hearings.

What is missing is permanent organization.

Federal prosecutor André Luiz Porreca Ferreira Cunha, in a press release of 7 August 2026 (unofficial translation)

Madeira and Tonantins rivers

Local situations that called for an immediate response were dealt with in specific recommendations. Recommendation No. 17/2025, of August 2025, was addressed to eight bodies in response to the concentration of more than five hundred dredges on the Madeira River, in an area close to Indigenous lands, and asked for an emergency plan for State presence and for arrests in flagrante delicto. It also advised that offenders should not be appointed custodians of the seized property, a practice that makes it easier for the equipment to return to the activity. In February 2025, the Federal Prosecution Service had already asked the Federal Police to open an inquiry into garimpo barges on the Madeira River, next to the Setemã Indigenous Land, in Borba, after reports of threats to the community.

An emergency plan for the Tonantins River was requested the following year in Recommendation No. 2/2026, of 18 March 2026, addressed to IBAMA, ICMBio, IPAAM, the Federal Police, the Amazonas Military Police and the Brazilian Navy. About three thousand riverine and Indigenous people live in the area and are exposed to mercury contamination from garimpo.



Mineral exploration and mining

The legislation allows ore to be extracted before a mining concession is granted only exceptionally, under a utilization permit (guia de utilização). A civil inquiry supplied with information from the Federal Police, IBAMA, ICMBio and state agencies nevertheless identified barges and dredges that held an exploration permit and were carrying out commercial mining. The signs were recurrent, such as vessels of a size incompatible with exploration, no technical supervisor on board and ore stocks far larger than sampling would produce.

Because no rule sets objective criteria of machinery, volume and method that would allow one activity to be told from the other in the field, the Federal Prosecution Service filed a public civil action against the National Mining Agency (ANM) on 27 February 2025. The central request is the issue of a regulation containing those criteria, a measure that guides enforcement and at the same time gives lawful miners predictability. In December 2025, the federal court granted interim relief in part and set a period of 180 days for the technical studies to begin, on pain of a daily fine.

PUBLIC CIVIL ACTION · CRITERIA TO DISTINGUISH EXPLORATION FROM MINING	
CASE No. 1004745-67.2025.4.01.3200	DEFENDANT National Mining Agency
CENTRAL REQUEST Regulation with objective criteria of machinery, volume and method for each phase, with limits per utilization permit	STATUS Interim relief granted in part in December 2025, with a period of 180 days for the studies to begin

Mining permits without corresponding mining

The artisanal mining permit (PLG) is the simplified title provided for in Law No. 7,805/1989 for garimpo activity, and it does not require prior mineral exploration. A submission by Greenpeace Brasil, supported by a study of 187 ANM mining files, pointed to irregularities in 98 permits located in the states of Pará, Mato Grosso and Rondônia and concentrated in the hands of twenty holders. Together these permits declared 25.3 tonnes of gold, valued at R\$ 18.4 billion in May 2026, equivalent to 97% of the metal declared in the files examined.



In 29.6% of the permits examined, the declared production is not matched by any physical trace of mining in the titled area, a situation that a technical opinion issued by the ANM itself calls a “ghost garimpo”. In 66.3% of them, adjoining permits are operated as a single undertaking, on a scale incompatible with the simplified regime, as in the case of thirteen titles held by one cooperative that together cover 13,561 hectares.

The effect of these patterns is to attribute a lawful origin to gold extracted elsewhere, including in Indigenous lands and protected areas. The complaint cites a permit covering 1.08 hectares that declared 776 kilograms of gold, valued at R\$ 570 million. The findings match those of the Federal Court of Accounts in Ruling No. 1469/2025 and the decision of the Federal Supreme Court that set aside the presumption of good faith in the purchase of the metal.

As the recommendation that preceded the lawsuit was not accepted, the Federal Prosecution Service filed a structural public civil action against the regulator on 7 July 2026. The action is not directed at particular miners. It seeks the correction of the rules and control routines of the permit regime. The regulator has moved in the same direction, and ANM Resolution No. 244/2026 now requires proof of actual mining for a permit to be renewed.



STRUCTURAL PUBLIC CIVIL ACTION · ARTISANAL MINING PERMITS	
CASE No. 1036996-07.2026.4.01.3200	DEFENDANT National Mining Agency
ORIGIN Preliminary file (notícia de fato) No. 1.13.000.002055/2026-98, opened on a submission by Greenpeace Brasil	STATUS Request for interim relief pending (information as of September 2026)

MAIN REQUESTS

- A technical working group within 30 days and a regulatory study within 120 days, with the eligibility criteria required by Law No. 7,805/1989.
- A national programme to inspect and reassess the permits that paid the mining royalty (CFEM) with no corresponding mining, within 60 days, with precautionary suspension of the titles.
- Reporting of the signs of unlawful conduct to the Federal Police, the Financial Activities Control Council (COAF, Brazil’s financial intelligence unit), the Federal Revenue Service and the Central Bank of Brazil.
- A permanent routine for cross-checking mining royalty returns, annual mining reports and remote sensing data, within 12 months.
- Assessment of adjoining permits as a single unit and a requirement of a prior environmental licence for new grants.



Seized mineral goods

The disposal of mineral goods seized in enforcement operations was regulated by ANM Resolution No. 209/2025, which in its original wording allowed them to be auctioned with no restriction on who could bid. The rule allowed the offender, or a person linked to the offender, to buy back the unlawfully extracted ore and so obtain a formal title of acquisition.

In July 2025, the Federal Prosecution Service recommended to the agency and to Caixa Econômica Federal, the federal bank responsible for the auctions, that the rule be changed. The recommendation was accepted in full, and ANM Resolution No. 222, issued at the end of 2025, prohibited the sale of seized mineral goods to persons under investigation, defendants, convicted persons and companies linked to them. The correction applies throughout the national territory and was obtained without the need for court action.

Mining applications and titles in protected areas

Another civil inquiry examines mining applications and titles that fall on areas where the activity is prohibited or depends on conditions that have not been met. In March 2025, a recommendation addressed to the ANM and to the Amazonas state environmental agency dealt with applications for artisanal mining permits along the Juruá River, which had been split up to get around the limit of ten thousand hectares imposed on cooperatives, and it required free, prior and informed consultation of the affected communities.

Months later, in July 2025, a further recommendation covered 21 active ANM mining files in Amazonas that overlap protected areas or lie closer to Indigenous lands than the minimum distance allowed. The agency was given 90 days to annul or suspend the proceedings, and the inquiry is monitoring compliance with the measures.

Mining enforcement powers

An audit by the Office of the Comptroller General (CGU), completed in March 2026, assessed federal control of unauthorized mining and recorded staffing and budget constraints at the regulator. Of the 355 reports of unauthorized mining received in 2024, 43% had still not been investigated in July 2025, although 78% of the site inspections carried out had confirmed the irregularity. The audit also found that 52% of enforcement actions had not been reported to the Federal Prosecution Service.



On the basis of the report, four preliminary files were opened, one for each group of findings. They deal with the verification of mineral origin at export, enforcement coverage, the rules on the custody and disposal of seized goods and coordination between the agency, the environmental agencies and the security forces. The steps under way seek to strengthen resources and routines, in dialogue with the agency and the audit body.

Quality of evidence gathered in the field

The infraction notice drawn up by the environmental inspector is usually the main evidence in the criminal and civil cases that follow an operation. When the document does not reliably identify the offender, the extent of the damage and the quantity of ore, accountability is compromised, because the situation found in the field cannot be reconstructed once the equipment has been destroyed.

For that reason, the state offices of IBAMA and the units of ICMBio were asked, in Recommendations No. 5/2025 and No. 6/2025, to adopt minimum content for notices and reports. The standard includes the caution on the right to remain silent, photographic and video records, the type and quantity of ore, the identification of witnesses and a record of any toxic substances found. Both recommendations were accepted in 2025, and the guidelines were incorporated into the training course for environmental enforcement agents. An administrative proceeding monitors their application in the notices drawn up since then.

The subject took on a national dimension in July 2026, when the Federal Prosecution Service brought together about twenty IBAMA and ICMBio staff at the Prosecutor General's Office to discuss the standardization of infraction notices and inspection reports. A complete notice saves the agencies themselves from repeating work, lowers the risk of cases becoming time-barred and can provide a sufficient basis for an indictment or a non-prosecution agreement, with no need for a police inquiry in the simpler cases. Proposals for an agreement listing the essential information had been sent to the heads of both agencies in June 2026.

FURTHER READING (IN PORTUGUESE)

- [Structural action seeks integrated and permanent enforcement in Amazonas](#)
- [Public hearings on the impacts of garimpo in Amazonas](#)
- [Period of 180 days for a study to distinguish mineral exploration from mining](#)
- [Action on artisanal mining permits](#)
- [Agency bans the sale of seized minerals to offenders](#)
- [Meeting with IBAMA and ICMBio on infraction notices](#)



4

Mercury and cyanide

Mercury links clandestine gold mining to the health of those who live off the rivers of the Amazon. For that reason, the work of the Federal Prosecution Service covers the rules that still allow the substance, the licences and mining titles granted without checking whether it is used, the trade that supplies it, the monitoring of contamination and the technical alternatives available.



Rules that allow the use of mercury

The Minamata Convention on Mercury, promulgated domestically by Decree No. 9,470/2018, requires the Brazilian State to reduce and, where feasible, eliminate the use of mercury in artisanal and small-scale gold mining. Decrees No. 97,507/1989 and No. 97,634/1989 nevertheless remain in force. They allow the substance to be used in licensed activities and regulate the registration of importers and traders. Over the years, state rules and federal regulations have reproduced that permission.

In August 2025, Recommendation No. 15/2025 asked the Amazonas state government to repeal two resolutions of the State Environmental Council that authorized, on an exceptional basis, the use of mercury in garimpos. On 2 October 2025, the council repealed both by unanimous vote, bringing state rules into line with the Convention and with the position of the Federal Supreme Court on a similar law enacted in Roraima.

At the federal level, Recommendation No. 14/2025 asked IBAMA, the federal environmental agency, to amend Normative Instruction No. 26/2024, which prohibits the sale of mercury to individual miners (garimpeiros) but makes an exception for holders of an artisanal mining permit whose licence authorizes the use of the metal. The agency replied that a full ban depends on the 1989 decrees being updated first. That reply moved the discussion to the federal executive branch and prompted the next step.

Technical Note No. 1/2025, of 10 December 2025, argues for the repeal of the two decrees on the ground that they are incompatible with the Constitution and with the Minamata Convention, and sets out the evidence that all the mercury used in mining in Brazil is of unlawful origin. The note was forwarded to the Office of the Chief of Staff of the Presidency (Casa Civil) through the 4th Chamber for Coordination and Review, the Federal Prosecution Service's body for environmental and cultural heritage matters. In May 2026, it was presented to the working group that monitors implementation of the Convention in the country. On that occasion, the Ministry of the Environment and Climate Change expressed agreement with the issuing of a new decree, and a final decision remains pending.

Before the National Congress, a technical note of April 2026 expressed support for Bill No. 2,417/2024, which would ban the use of mercury in mining activities altogether. Enactment of a statute gives the ban legal certainty and supersedes the regime of the 1989 decrees. Another technical note, now being drafted, examines Bill No. 1,011/2023, passed by the Federal Senate in December 2025, which would establish a national policy on preventing exposure to mercury.



Licences and titles granted without method checks

If all the mercury available in the country comes from smuggling, an environmental licence that does not require the applicant to state the processing technique ends up allowing amalgam to be used without any control. On that basis, Recommendation No. 16/2025 asked the National Mining Agency (ANM) and the environmental agencies of the states of Amazonas, Roraima, Rondônia and Acre to require that information, reject applications based on the use of mercury and review the licences and mining titles already granted.

Three of the four states complied with the recommendation or reported that they had no licences of that kind. On 4 December 2025, Roraima's environmental agency suspended the granting of licences for gold extraction for an indefinite period. The following day, the Amazonas agency provided proof that the licences under suspicion had been suspended and that a rule prohibiting the use of the substance had been issued, and the Acre agency reported that there was no licensed gold extraction in the state.

Rondônia did not accept the recommendation, which led to the filing of a public civil action in April 2026, later amended to include the ANM. The survey filed in support of the case counted 129 active mining titles for gold in the four states, 98 of them in Rondônia. Invoices from a single supplier recorded the circulation of 276 kilograms of mercury in 2020.

On 15 August 2026, the federal court granted interim relief in a decision that characterized the case as structural. In the course of the proceedings, the mining regulator submitted an action plan, which the court accepted, and negotiations on a conduct adjustment agreement with the regulator moved forward. The decision was communicated to the Federal Supreme Court, because of its points of contact with Writ of Injunction (Mandado de Injunção) No. 7,516.



Press release on the
decision (in Portuguese)

PUBLIC CIVIL ACTION · MERCURY AND CYANIDE IN LICENSING AND GOLD MINING TITLES	
CASE No. 1008771-90.2026.4.01.4100	COURT 5th Federal Environmental and Agrarian Court of Rondônia
DEFENDANTS State of Rondônia and National Mining Agency	STATUS Interim relief granted on 15 August 2026



WHAT THE DECISION ORDERED

- The mining regulator must survey the gold mining titles in Amazonas, Acre, Rondônia and Roraima, identifying the mining technique, the processing route and any use of mercury or cyanide.
- Rondônia's environmental agency must re-examine the licences in force, with a timetable within three months, individual notice to the operators and a requirement of internal traceability of the substance in cooperatives.
- Title holders must prove the origin and lawfulness of the input, failing which the activity will be suspended as a precautionary measure.
- The same requirements must be built into new applications throughout the national territory, and half-yearly reports must be submitted to the court.

The Rede sem Mercúrio project

In early 2024, the Federal Prosecution Service found thousands of listings for metallic mercury on e-commerce platforms and social media, with the product being bought by users located in garimpo regions. The Rede sem Mercúrio (Mercury-Free Network) project was set up to remove that supply from the online environment and to identify sellers and buyers.

The method follows successive steps, beginning with the identification and documentation of the listings and the opening of a civil inquiry for each platform. A recommendation follows, calling for removal of the content, automated filters with human review, an express prohibition in the terms of use and disclosure of the advertisers' registration data. Where appropriate, the obligations are consolidated in a conduct adjustment agreement, and follow-up proceedings check every thirty or forty-five days whether listings have reappeared.

By August 2026, four agreements had been signed, with Mercado Livre, OLX, B2Brazil and Alibaba.com, and most of the other platforms notified had accepted the recommendations, with no need for court action against the companies that complied. The information obtained feeds criminal investigations into the links in the supply chain. In May 2025, one of those investigations led to a search and seizure at the home of a person under investigation for garimpo on the Japurá River, in Operation Yakuruna.



Visual identity of the Rede sem Mercúrio project. MPF.



PLATFORMS COVERED BY THE PROJECT

Platform	Instrument	Outcome
Mercado Livre	Recommendation No. 1/2024 and conduct adjustment agreement with a three-year term	Removal of reported listings within 24 hours, a dedicated reporting tool and detection by artificial intelligence
OLX	Recommendation No. 7/2024 and conduct adjustment agreement with a three-year term	Automated filters with human review and removal within 72 hours
Facebook and Instagram	Recommendation No. 8/2024	Listings removed in January 2025, with periodic checks finding nothing new
B2Brazil	Conduct adjustment agreement of February 2025, with a five-year term	Mercury recognized as illegal content and removal within three business days
Alibaba.com	Recommendation No. 3/2025 and agreement of November 2025, with a two-year term	Removal within five business days and registration data within 72 hours. Twelve new listings removed in May 2026
Global Sources	Recommendation No. 4/2025	Offers removed. The substance was being advertised under the guise of packaging
YouTube	Recommendation No. 7/2025	Twelve videos removed in August 2025
Shopee	Recommendation No. 18/2025	Posts removed and keywords added to the automatic filter
Made-in-China.com	Recommendation No. 8/2025	Being monitored
TikTok	Recommendation No. 10/2026, announced in September 2026	Three profiles, 108 posts and more than 5.8 million views identified. Reply due within 30 days
eBay	Civil inquiry opened in August 2026	Under investigation

Monitoring contamination

Brazil has no permanent and integrated routine for monitoring mercury contamination. Without reliable time series, the damage cannot be measured, polluters are harder to hold liable and the health response for exposed populations is delayed. The data gathered in the proceeding indicate that 26.1% of the fish collected in Porto Velho exceed the safe limit and that estimated daily intake is 5.8 to 26.7 times the reference dose.

Recommendation No. 3/2026, of 19 March 2026, proposed to federal and state environmental and health bodies a national system with a public georeferenced platform, standardized methods, integration of environmental and epidemiological data and periodic bulletins. As none of the addressees committed to measures with set deadlines, the Federal Prosecution Service filed Public Civil Action No. 1048878-63.2026.4.01.3200 in September 2026 against the Union (the federal government), IBAMA, the National Water and Sanitation Agency and the states of Amazonas, Rondônia and Roraima.



REQUESTS IN THE ACTION ON MONITORING

- An inter-agency committee within 30 days and an implementation plan within 120 days.
- Inclusion of mercury in the national water quality monitoring network within 90 days.
- A first joint sampling campaign within 180 days.
- A national system in operation within 12 months and a public data platform within 24 months.

Technological substitution

A regulatory ban on its own does not change the routine of the garimpos, because replacing amalgam depends on credit, technical assistance and technology within reach of small-scale miners. The alternatives exist and are more efficient, since gravity concentration methods recover 80% to 90% of the gold, against 20% to 40% for amalgamation. Consulted in the proceeding, the federal public banks reported that they had no specific credit line for this purpose.

In view of that gap, Recommendation No. 6/2026, of 18 May 2026, was addressed to ten public bodies and financial institutions, among them the Ministry of Mines and Energy, the ANM, IBAMA, the Brazilian Development Bank (BNDES), Banco da Amazônia, Banco do Brasil, Caixa Econômica Federal and the Office of the Chief of Staff of the Presidency. The text proposes a national technology transition programme, with targets and a timetable, credit lines for gravity concentration equipment, calls for research proposals and pilot projects, as well as certification of gold produced without mercury.

National action plan under the Minamata Convention

Brazil acknowledged in 2019 that artisanal and small-scale gold mining in its territory is more than insignificant, which obliges it to submit a national action plan. The draft being prepared at the Ministry of Mines and Energy rests on an assessment that heard 1,145 people, of whom 1,051 were miners and 51 were public officials, with no participation by Indigenous peoples, riverine communities or civil society organizations.

Recommendations No. 8/2026 and No. 9/2026, of June and July 2026, called for a broad process of public participation and for free, prior and informed consultation of Indigenous peoples and traditional communities, as provided for in Convention No. 169 of the International Labour Organization. Once the public consultation had opened, a technical note of 8 July 2026 analysed the draft and pointed to, among other issues, its premise that a lawful stock of mercury exists in the country and its



peripheral treatment of Indigenous lands. The document concludes that the text needs to be revised before it is sent to the Secretariat of the Convention.

Cyanide

The rise in the price of mercury has led some garimpos to replace it with cyanide, which dissolves the gold in crushed ore and in tailings and increases the environmental risk. In December 2025, Recommendations No. 25/2025 and No. 26/2025 asked six federal bodies to carry out urgent remediation of contaminated areas in the Raposa Serra do Sol Indigenous Land, in Roraima, where pools of the compound were found close to Indigenous communities, and to negotiate an agreement with Guyana on the subject.

At the national level, a proceeding opened in March 2026 monitors the capacity of federal bodies to control, neutralize and dispose of the substance. The initiative arose from the discovery of a cyanide leaching dam at a clandestine garimpo in the Sararé Indigenous Land, in Mato Grosso, when the bodies present reported that they lacked the technical means to neutralize the compounds.

Criminal liability for mercury

Gold that leaves the garimpo without industrial refining retains residual mercury. For that reason, indictments for transporting gold now charge, alongside usurpation of federal property, the offence under article 56 of Law No. 9,605/1998, which concerns the transport of a toxic substance in breach of legal requirements. The argument was reinforced by a technical and scientific opinion of August 2026, prepared by researchers at the Federal University of Pará in response to questions from the Federal Prosecution Service. According to the document, the substance accounts for between 2% and 5% of the weight of raw gold and continues to evaporate during transport and storage.

The charge was upheld in the judgment in the case of the seizure of 103 kilograms of gold in Roraima, described in chapter 7, and the opinion, the model indictment and the judgment were shared with the other members of the Federal Prosecution Service who work in this field. On another front, an appeal lodged in August 2026 seeks an increase in the sentence imposed on a defendant convicted of transporting 38 kilograms of mercury of Bolivian origin on a scheduled bus in Rondônia.

FURTHER READING (IN PORTUGUESE)

- [Amazonas repeals rules that allowed the use of mercury in mining](#)
- [Technical note calling for the repeal of the 1989 federal decrees](#)
- [Court decision on mercury and cyanide in gold garimpos](#)
- [Digital platforms and the mercury trade](#)
- [Recommendation to TikTok](#)
- [Action for a national monitoring system](#)
- [Recommendation on replacing mercury](#)
- [Remediation of cyanide-contaminated areas in Roraima](#)



5

Logistics, borders and territories

Mining sites depend on airstrips, fuel, communications and vessels, and all of these goods and services are subject to some form of official registration or authorization. This chapter deals with the measures directed at that infrastructure, at border routes and at the protection of Indigenous lands and of communities located around mining sites.



Clandestine airstrips and aerodromes

Air transport supplies the most isolated mining sites and takes the extracted ore out, above all in Indigenous lands. Data from CENSIPAM, the federal centre that manages the Amazon protection system, indicate that the number of irregular aerodromes in Amazonas, Acre, Rondônia and Roraima rose from 749 in March 2024 to 844 in April 2025, of which 175 are inside Indigenous lands. At a court hearing in March 2026, the National Civil Aviation Agency (ANAC) reported that it had mapped more than 1,200 clandestine airstrips across the Amazon region.

749 → 844 irregular aerodromes in four states, between March 2024 and April 2025 CENSIPAM	175 of these airstrips are inside Indigenous lands CENSIPAM	1,200+ clandestine airstrips mapped across the Amazon ANAC, March 2026
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Following a recommendation issued in 2024, the Federal Prosecution Service filed a public civil action in September 2025 to require the federal and state bodies with responsibility in the matter to draw up and carry out an integrated plan to identify, close and disable these structures. The action also seeks enforcement against the use of aircraft linked to garimpo and the extension to the other states of the air-space policing measures now applied in Roraima. In the course of the proceedings, the defendants acknowledged the seriousness of the problem and disagreed over which body is responsible for destroying the airstrips, which reinforces the need for a common plan.

PUBLIC CIVIL ACTION · CLANDESTINE AERODROMES AND AIRSTRIPS	
CASE No. 1041349-27.2025.4.01.3200	COURT 7th Federal Environmental and Agrarian Court of Amazonas
DEFENDANTS ANAC, IBAMA (the federal environmental agency), ICMBio (the federal protected-areas agency), the Union (the federal government), the state environmental agencies of Amazonas (IPAAM) and Roraima (FEMARH), and the State of Rondônia	STATUS Preliminary hearing in March 2026. Request for interim relief renewed and pending (information as of August 2026)

Aviation fuel

Without aviation kerosene and aviation gasoline, the air operation that sustains garimpo in the Yanomami Indigenous Land cannot be kept running. The public civil



action filed in February 2025 showed the lack of control over the distribution chain in Roraima, where a single company had sold more than 860,000 litres to unidentified buyers and thirteen refuelling points were operating without authorization.

In April 2025, the federal court granted interim relief and ordered the National Agency of Petroleum, Natural Gas and Biofuels (ANP) to submit a schedule for inspecting resellers. The judgment of 11 December 2025 granted the claims in full. The agency must inspect resellers and refuelling points on a continuous basis, suspend the authorizations of companies that are irregular or that support illegal mining, and put in place a computerized system for tracking movements of aviation fuel, as well as pay R\$ 100,000 in collective moral damages, that is, compensation for harm done to the community as a whole.

The decision shifts the response from enforcement on the ground to control of an input without which the activity cannot operate, with longer-lasting effects and lower operating costs. The appeal lodged against the judgment is awaiting a ruling by the Federal Regional Court of the 1st Region, the federal court of appeals (Public Civil Action No. 1001829-67.2025.4.01.4200).



Press release on the
judgment (in Portuguese)

Satellite internet

From 2023 onwards, enforcement teams began to find satellite internet terminals at practically every garimpo they inspected. The connection allows dredges to be controlled remotely and gives advance warning of the teams' arrival. The civil inquiry opened to address the issue found that most of the antennas seized were registered in the names of third parties, at urban addresses far from the place of use, and that the registration required by the operator did not include an official photo ID or proof of address.

After about four months of negotiation, the Federal Prosecution Service and Starlink signed Agreement No. 3/2025 on 23 June 2025. The 4th Chamber for Coordination and Review, the Federal Prosecution Service's body for environmental and cultural heritage matters, ratified it on 31 July of the same year. The instrument, the company's first formal agreement with Brazilian authorities, has a renewable two-year term and covers the nine states of the Legal Amazon.

WHAT THE AGREEMENT PROVIDES

- Full identification and proof of address required to activate new terminals in the Legal Amazon, since January 2026.
- Registration data supplied to the Federal Prosecution Service and the Federal Police on request.
- Service blocked for users identified as engaged in illegal garimpo, with re-registration under the same details barred.
- Geolocation data for terminals under investigation supplied by court order.
- Ownership of seized antennas transferred to public bodies within 30 days, for use in enforcement itself.



The implementation phase began in October 2025, with the publication of a public notice for the registration of public bodies interested in receiving the seized terminals. A circular letter advised the Federal Police, IBAMA, ICMBio and the state environment departments to preserve the antennas instead of destroying them and to report seizures. In June 2026, the initiative won the fourteenth edition of the República Award of the National Association of Federal Prosecutors (ANPR), in the category for combating crime and other unlawful acts.

Dredges, barges and shipyards

It falls to the maritime authority to register and inspect the vessels that navigate the rivers of the Amazon, a significant responsibility in a region where river garimpo is organized around dredges and barges. The first action on the subject, from February 2025, concerned a dredge destroyed in an environmental operation on the Japurá River. The Brazilian Navy had taken the view that the destruction of the equipment prevented an infraction notice from being issued against its owner. In granting interim relief, the federal court rejected that view and suspended the mining titles linked to the case (Public Civil Action No. 1004207-86.2025.4.01.3200). In March 2026, following the opinion of the Federal Prosecution Service, the federal court dismissed a writ of mandamus in which the owner of a dredge sought preventive protection against enforcement by IBAMA and the Federal Police on the Madeira River (Writ of Mandamus No. 1003742-24.2018.4.01.3200).

The dialogue that followed led to a change of approach, recorded at a meeting on 10 December 2025. At that meeting, the Command of the 9th Naval District confirmed that it would begin to hold the owners of vessels used in illegal garimpo administratively liable even when the equipment had been destroyed, on the basis of indirect evidence such as photographs and videos. The initiative was reported to the 4th Chamber for Coordination and Review so that the approach can be made uniform across the Legal Amazon.

A civil inquiry devoted to the subject identified a problem that arises before any inspection takes place. Dredges and barges obtain registration without any requirement of an environmental licence or mining title, so that registration



extends to equipment intended for unauthorized mining. Recommendation No. 5/2026, of July 2026, proposed six measures to the naval commands operating in the nine states of the Legal Amazon, to begin within sixty days.

MEASURES RECOMMENDED TO THE MARITIME AUTHORITY

- Naval inspection before dredges and barges are registered.
- An environmental licence and a mining title as a condition for operating these vessels.
- Physical inspection at each periodic validation of the registration certificate.
- A study on making satellite tracking mandatory for dredges in the Legal Amazon.
- Infraction notices based on indirect evidence, even where the vessel has been destroyed.
- Preventive inspection of shipyards and workshops.

The last measure relates to an investigation opened in July 2026, following a referral from IBAMA, into a shipbuilding yard in Manaus alleged to be building dredges and barges for garimpo without an environmental licence. During the inspection, the yard's activities were placed under embargo and assets valued at about R\$ 2 million were seized, among them a garimpo barge under construction. The facts remain under investigation.

Guajará-Mirim river port

The Mamoré River separates Guajará-Mirim, in Rondônia, from the Bolivian town of Guayaramerín and is one of the main entry routes for mercury bound for the garimpos. An on-site inspection in June 2025 found no effective checks on people or goods at the river port, X-ray equipment that had long been out of service and clandestine access points along the banks. About ninety vessels and seven hundred people pass through the site each day.



Images from the Federal Prosecution Service's inspection of the Guajará-Mirim river port and its surroundings, in June 2025.

Photos: MPF.



Recommendation No. 10/2025 asked the Federal Police, the Federal Revenue Service and the Brazilian Navy to post officers permanently at the port, close the clandestine access points and repair the inspection equipment. As the measures were not adopted, the Federal Prosecution Service filed a public civil action in March 2026 against the Union and the National Waterway Transport Agency (ANTAQ). On 29 April 2026, the federal court granted interim relief in part and ordered that an integrated action and inspection plan be drawn up within ninety days for the exercise of customs, police and waterway powers at the site.

PUBLIC CIVIL ACTION · GUAJARÁ-MIRIM RIVER PORT	
CASE No. 1004553-19.2026.4.01.4100	DEFENDANTS The Union and the National Waterway Transport Agency
DECISION Interim relief granted in part on 29 April 2026, with 90 days for the integrated plan	STATUS Defendants’ appeals pending. Reply and further submission by the Federal Prosecution Service in July and August 2026

On the highways, checks on the transport of ore and inputs depend on vehicle scanners, which can reveal hidden compartments. Recommendation No. 2/2024 asked the Federal Highway Police to allocate such equipment to its units in Roraima and Rondônia, which had no working device, and was accepted in full.

Incitement to garimpo on social media

Besides the trade in inputs, digital platforms are used to promote garimpo activity in prohibited areas and for communication among those involved. A civil inquiry opened in 2024 documented, in five reports produced over twenty-eight months, posts inciting and glorifying illegal garimpo on Facebook and Instagram. The company removed the content notified to it, but posts in identical terms continued to be found in subsequent checks.

As no agreement was reached, the Federal Prosecution Service filed a public civil action in August 2026 with requests of a preventive nature. The complaint asks that a notice be displayed to anyone who posts or boosts content about mining, stating that the activity requires a mining title and an environmental licence, and that a plan to improve the detection systems be submitted. The request for an interim injunction was denied, and the appeal lodged against that decision awaits a ruling (Public Civil Action No. 1009022-02.2026.4.01.4200).



Indigenous lands and their surroundings

In Rondônia, unlicensed cassiterite (tin ore) garimpo at Fazenda Marechal Rondon, a farm next to the Uru-Eu-Wau-Wau Indigenous Land, served as a logistics base and a pull factor for invasions of the territory. The public civil action filed in April 2025 obtained, on 27 June of the same year, interim relief requiring the Union, the State of Rondônia and the National Mining Agency (ANM) to draw up, within ninety days, a territorial protection plan to halt the activity and prevent further invasions (Public Civil Action No. 1005503-62.2025.4.01.4100).

A civil inquiry in Amazonas is examining the contamination of rivers inside the Waimiri Atroari Indigenous Land, attributed to tailings from a tin mining operation located in the Pitinga region. A technical report recorded dissolved aluminium at a concentration thirty-seven times the regulatory limit. After meetings with the company, the Indigenous association and FUNAI, the federal agency for Indigenous peoples, the Federal Prosecution Service formally requested a police inquiry and an inspection and, in July 2026, recommended immediate containment of the tailings, a review of the licensing by IBAMA and urgent measures by the ANM.

Also in Amazonas, a decision of June 2026 suspended all mineral extraction in the Boca do Acre Indigenous Land, in the south of the state, from which lateritic gravel (piçarra) was being removed for urban paving works without authorization from the competent bodies. The federal court shifted the burden of proof in favour of the community at large. The reparation actions concerning garimpo in other Indigenous lands and in protected areas are described in chapter 7.

Mining tailings dams

Cassiterite mining in Rondônia has left behind tailings dams whose safety is monitored in civil inquiries and court actions. In one case, the recommendation was complied with, and the decommissioning of the Taboquinha 2 dam was completed in December 2024. In the others, the Federal Prosecution Service is asking that the operators meet the technical requirements and that the mining regulator exercise its enforcement powers.

ACTIONS ON MINING DAMS AND STRUCTURES IN RONDÔNIA

Structure	Case	Subject and status
Igarapé Mutum dam, in Ariquemes	No. 1001987-34.2025.4.01.4100	Dam at alert level since February 2024 because of an inadequate spillway. Action filed in February 2025
Jacaré Superior and Jacaré Inferior dams	No. 1025324-52.2025.4.01.4100	Joint inspection with the ANM in September 2025. Interim relief denied, with the burden of proof shifted. Reply of July 2026
Structures in Oriente Novo	No. 1012834-61.2026.4.01.4100	Reparation for the 2019 failure, which cut off about one hundred families and degraded 114.57 hectares. Action filed in June 2026



FURTHER READING (IN PORTUGUESE)

- [Action on clandestine airstrips and aircraft](#)
- [Judgment on the inspection of aviation fuel](#)
- [Agreement with Starlink](#)
- [Recommendation to the Navy on dredges and barges](#)
- [Decision on the port of Guajará-Mirim](#)
- [Action on content that encourages illegal garimpo](#)
- [Protective measures around the Uru-Eu-Wau-Wau Indigenous Land](#)
- [Recommendation on contamination in the Waimiri Atroari Indigenous Land](#)



6

Traceability and the market

Ore mined without a title yields a profit only once it enters the formal market, and that entry depends on documents that attribute a lawful origin to it. The measures gathered in this chapter aim to make the declared origin verifiable against independent data, from the mining title to export.



Gold

In April 2023, the Federal Supreme Court suspended the statutory presumption of good faith in favour of gold buyers, which had allowed purchasing institutions to rely on the seller's bare declaration, and in March 2025 it unanimously declared the rule unconstitutional. Electronic invoices became mandatory for transactions in the metal in the same period and, according to Instituto Escolhas, production reported by garimpos fell by 84% between January and July 2024 compared with the same months of 2022.

Limitations remain, because the origin stated at the first sale is still declared by the seller, with no physical check at the extraction site, and there is as yet no marking of the metal or digital record of transactions. Bill No. 3,025/2023, which would establish such a system, was passed by the Chamber of Deputies in April 2026 and is pending in the Federal Senate.

GOLD TRACEABILITY IN BRAZIL

What exists	What is missing
First purchase of garimpo gold restricted to institutions authorized by the Central Bank	Verification of the origin declared by the seller at the first sale
End of the presumption of good faith in favour of the buyer, by decision of the Federal Supreme Court	Physical verification at the extraction site and at the first purchase
Mandatory electronic invoice	Marking of the metal and digital recording of transactions, provided for in a pending bill
Forensic origin analysis by the Federal Police, used after seizures	A bank of reference samples broad enough for the analysis to be used preventively

In the legislative debate, a technical note of July 2026 called for the rejection of Bill No. 6,432/2019 in so far as it authorizes commercial companies to buy gold directly in garimpo areas. The note argues that the first purchase should remain exclusive to institutions authorized by the Central Bank and that a public traceability system should be put in place beforehand, with a validated document of origin, georeferencing and accountability along the chain.

Forensic origin analysis

The Federal Police's Ouro Alvo programme compares the chemical, isotopic and morphological profile of a gold sample with reference samples from known extraction areas. The result is admitted in court as expert evidence, alongside documents, satellite images and financial data. Its accuracy depends on the breadth of the reference bank, which is why the tool is still used, as a rule, only after a seizure.



Expanding that bank with samples from more producing regions and from neighbouring countries would allow the technique to be used preventively, through sampling at the first purchase, at refining and at export. The Federal Prosecution Service follows the matter and took part, in December 2025, in the international seminar on traceability in the gold supply chain held by the Federal Police.

Cassiterite and tin

For tin ore, there is no statutory traceability mechanism comparable to the one for gold, which allows ore of illicit origin to be mixed with ore of lawful origin at the very first link in the chain. Without identified lots or a reference geochemical signature, proof of origin depends on case-by-case forensic analysis, which is costly and difficult to produce.

On 27 February 2026, the Federal Prosecution Service recommended that seven federal bodies create a national system for tracing cassiterite (tin ore) and tin. The recommendation was addressed to the National Mining Agency (ANM), the Geological Survey of Brazil, the Brazilian Mint, the Central Bank, the Financial Activities Control Council (COAF, Brazil's financial intelligence unit), the Federal Police and IBAMA (the federal environmental agency), and proposes an inter-agency technical group, mandatory tracing by lot and a national geological database. Technical feasibility was confirmed by the National Institute of Criminalistics (the Federal Police forensic laboratory) and by the Geological Survey of Brazil.

Exports

The audit by the Office of the Comptroller General (CGU) mentioned in chapter 3 found that minerals are exported without any systematic cross-check between the cargo, the mining title and the declared production. A preliminary file (notícia de fato) opened on the basis of that finding is gathering information from the mining regulator, from the federal foreign trade body and from a port authority, with the aim of identifying routines that could be adopted to verify origin when the goods leave the country.

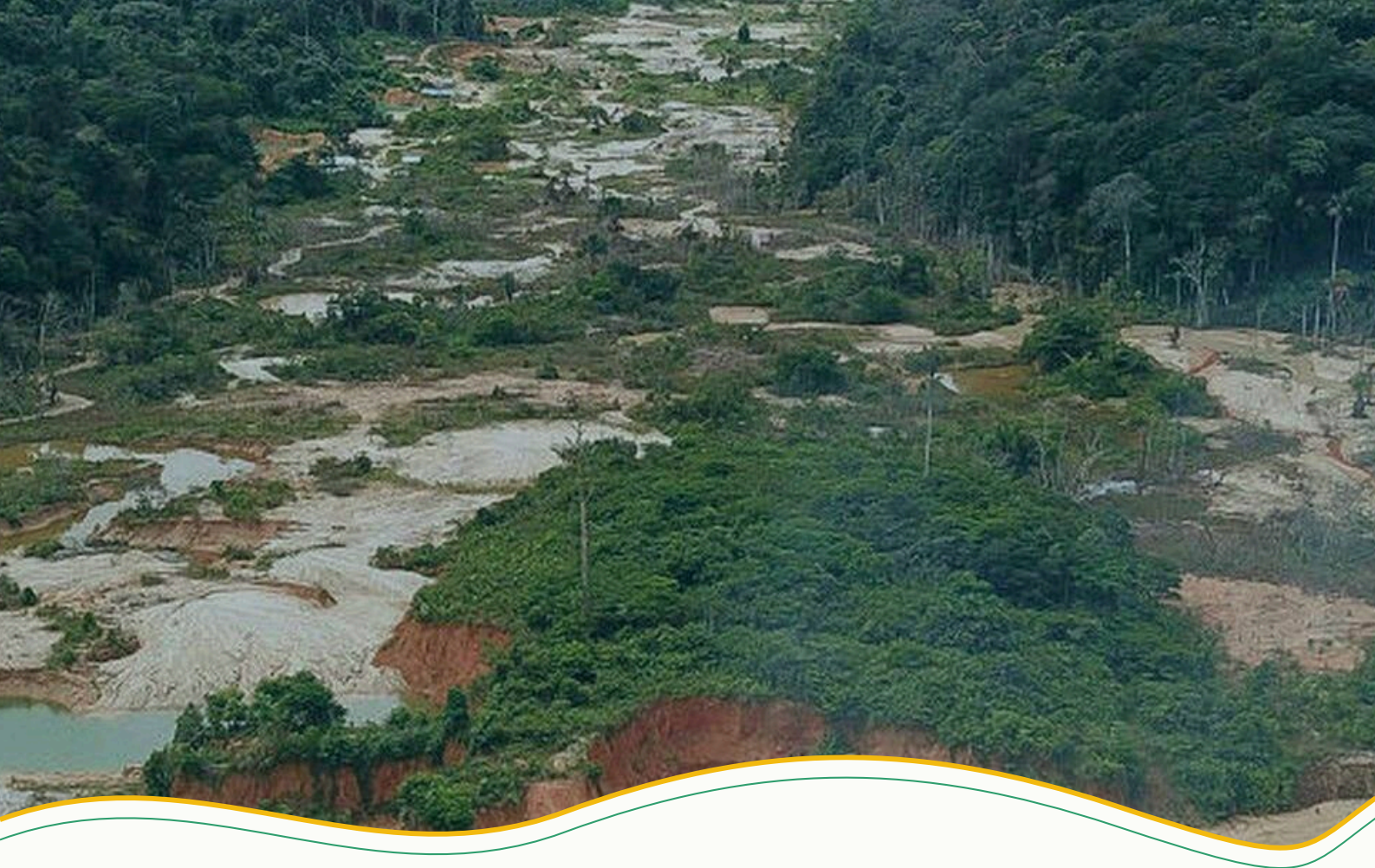
Corporate liability

Legal entities are strictly liable for acts harmful to the public administration under Law No. 12,846/2013, among them the use of an intermediary to conceal the real interests involved and the obstruction of inspection activity. The Superior Court of Justice has already held that the law applies even where there is no corruption in the strict sense and that court action does not require prior administrative proceedings. On that basis, the specialized offices applied the law for the first time to the corporate chain behind ore of illicit origin, in the case described below.



FURTHER READING (IN PORTUGUESE)

- [Recommendation on the tracing of cassiterite and tin](#)
- [Technical note on the bill that changes the rules on gold purchases](#)
- [Federal Supreme Court strikes down the presumption of good faith in the gold trade](#)
- [Chamber of Deputies approves a new legal framework for the gold market](#)
- [International seminar on gold traceability](#)



7

Leading cases

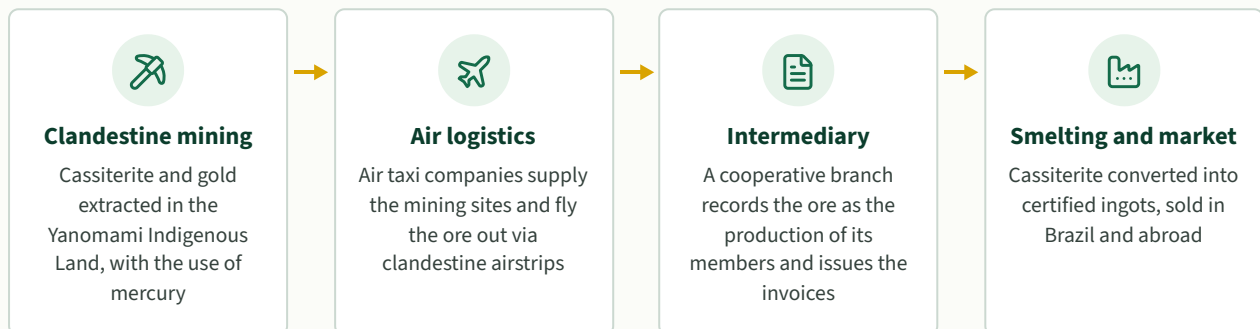
The cases in this chapter were selected for the scale of the facts, the legal theories adopted or the results already obtained. Some of them are conducted jointly with the Special Action Groups against Organized Crime (GAECO), and, unless otherwise indicated, the proceedings are ongoing.



Operation Forja de Hefesto

The Federal Police investigation, opened in April 2022 and concluded in April 2026, examined the extraction of cassiterite (tin ore) and gold in the Pupunha region, in the Mucajaí River basin, inside the Yanomami Indigenous Land, between March 2021 and December 2022. According to the indictment, accepted by the court on 17 August 2026, the ore was flown out, recorded by a cooperative as the production of its members and sold to a smelter in Rondônia, which converted it into tin ingots. The charges are brought against six individuals and four legal entities.

THE CHAIN DESCRIBED IN THE INDICTMENT



According to the indictment, the seized accounting records show 525 tonnes of cassiterite handled between May and August 2021 alone. A Federal Police analysis report indicates that the cooperative's account received R\$ 174.3 million in credits between 22 February and 22 July of that year, of which R\$ 166.3 million came from the smelter. The prosecution also alleges that the cooperative's branch in Roraima had no actual members and no registered employees and paid no mining royalty (CFEM) in the state, and that the areas covered by its titles showed no sign of mining in satellite images.

525 t of cassiterite handled in four months of 2021	R\$ 166.3 m transferred by the smelter to the cooperative in five months	R\$ 174.3 m total credits in the cooperative's account in the same period
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The ingots circulated with international industry certifications, and the tax documentation was formally in order. According to information from the smelter itself, the cooperative remained its main supplier from 2022 to 2024, with 12,488 tonnes over the three years, all its branches included, about half of the company's purchases in the period. When called on in a civil inquiry to prove the origin of the ore, the cooperative declared its production from 2023 to 2025, without submitting any document of origin and without information on 2021 and 2022.



Press release on the decision (in Portuguese)



CASSITERITE SUPPLIED BY THE COOPERATIVE TO THE SMELTER FROM 2022 TO 2024 (tonnes)



Source: information provided by the smelter itself in a civil inquiry. With all the cooperative's branches included, the three-year total is 12,488 tonnes.

The response was organized as three actions on the same facts, each with its own function. The criminal case seeks the punishment of the individuals and legal entities charged, the public civil action for reparation seeks restoration of the damage and a change in corporate conduct, and the action based on Law No. 12,846/2013 seeks sanctions against the four corporate defendants. The evidence gathered in the criminal investigation supports both civil actions.

THREE ACTIONS ON THE SAME FACTS

	Criminal case	Public civil action for reparation	Action under Law No. 12,846/2013
Case number	No. 1003352-22.2022.4.01.4200	No. 1010705-74.2026.4.01.4200	No. 1011028-79.2026.4.01.4200
Defendants	Six individuals and four legal entities	Ten defendants, individuals and legal entities	Four legal entities
Subject matter	Usurpation of federal property, environmental offences, money laundering and criminal organization, among others	Full reparation, collective moral damages and duties to verify origin	Fine, forfeiture, partial suspension of activities and ban on public incentives
Amount in dispute	Not applicable	R\$ 1,698,113,219.00	R\$ 146,006,080.44
Status	Indictment accepted by the court on 17 August 2026	Interim relief granted in part on 17 September 2026	Interim relief granted in part on 18 September 2026

Reparation action and duties to verify origin

Filed on 4 September 2026, the action seeks the recovery of the degraded areas and damages of at least R\$ 53.1 million for the ore taken from the assets of the Union (the federal government), R\$ 25 million for residual environmental damage and R\$ 1.62 billion in collective moral damages. It also asks that the smelter and the cooperative be required to prove the origin of each lot of ore, under permanent programmes with annual independent audits and periodic reports, the smelter's programme to be aligned with the Due Diligence Guidance of the Organisation for Economic Co-operation and Development (OECD) for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

On 17 September 2026, the 1st Federal Civil Court of Roraima granted the interim relief in part. On a preliminary assessment, the decision noted that the commercial relationship between the smelter and the cooperative had continued after the police operation, under the same private controls that had failed to detect the irregular origin of the ore. The court declined, for now, to order the independent



audit with field verification, and it refused the conditional suspension of activities in the form requested, which may be sought again in the event of non-compliance.

With each lot acquired without proof of origin, the introduction of ore of unknown provenance into the formal market is consummated irreversibly, with the definitive dilution of its traceability in the smelting process and its conversion into an exported product.

Decision of 17 September 2026, 1st Federal Civil Court of Roraima (unofficial translation)

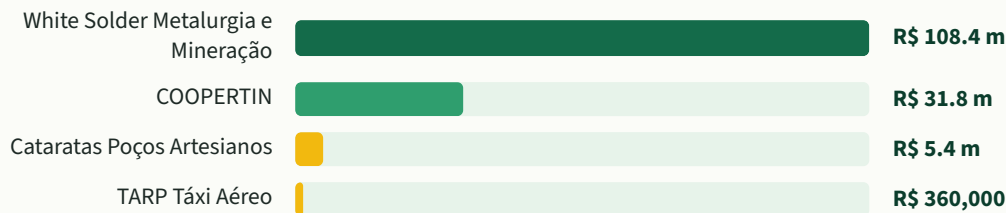
WHAT THE DECISION OF 17 SEPTEMBER 2026 ORDERED

- For the smelter, a ban on acquiring, receiving, recording or selling cassiterite without a tax document that identifies the ANM mining file, the title in force and the environmental licence and, in the case of cooperatives, the producing member and the titled area.
- Lot-by-lot verification of the purchases made from the defendant cooperative and submission, within 30 days, of the list of purchases since 1 January 2021.
- For the cooperative, a ban on receiving or selling ore from non-members or from areas without a title and a licence, together with delivery of the list of members, titles, annual mining reports and payment receipts.
- For both companies, appointment of a compliance officer within 30 days, implementation of a verification protocol and of individualized records within 60 days, and reports to the court and to the Federal Prosecution Service every 90 days.
- A fine of R\$ 50,000 per day of non-compliance and of R\$ 20,000 per day of delay in the reports, capped for now at R\$ 5 million per defendant.

Corporate liability action

The second public civil action, filed on 14 September 2026, attributes to the smelter the harmful acts of financing the unlawful activity, using an intermediary and obstructing inspection, to the cooperative the last two of those acts, and to the other two companies financing and obstruction, all set out in article 5 of Law No. 12,846/2013. The sanctions sought comprise a fine of 10% to 12% of gross revenue, forfeiture of the amounts obtained, partial suspension of activities and a ban on receiving public incentives. Dissolution of the companies was not requested, out of regard for proportionality.

Four days later, on 18 September 2026, the court ordered a freeze on the assets of the four defendants, up to a total limit of R\$ 146 million, to be enforced gradually and with lawful activities preserved. The decision required the Federal Revenue Service to report the companies' gross revenue from 2021 to 2025, for the calculation of the fine, and left the other sanctions for the judgment on the merits.


ASSET FREEZE ORDERED ON 18 SEPTEMBER 2026 (limit per defendant)


Defendants identified as reported in the press releases published by the Federal Prosecution Service. Total of R\$ 146,006,080.44.

Seizure of 103 kilograms of gold in Roraima

On 4 August 2025, during a routine check on the BR-401 highway in Boa Vista, the Federal Highway Police found 205 gold bars in a hidden compartment in the dashboard of a pickup truck. The cargo weighed 103.1 kilograms and was valued at R\$ 54 million, with no invoice or document of origin. The judgment records that it was the largest gold seizure ever made in the country.

The nature of the metal was established by the forensic examination of the National Institute of Criminalistics of the Federal Police. The report identified bars of raw gold, with purity ranging from 58.77% to 99.89%, in an amalgam of gold and mercury, features typical of garimpo extraction without industrial refining. That result supported two charges, transport of raw material belonging to the Union and transport of a toxic substance, alongside receiving the proceeds of crime.

FROM ARREST TO JUDGMENT

- 4 Aug. 2025** ● Arrest in flagrante delicto and seizure of 103.106 kg of gold, in 205 bars, on the BR-401.
- Sept. 2025** ● Indictment filed jointly with the Special Action Group against Organized Crime, just over five weeks after the arrest.
- 15 Dec. 2025** ● Conviction by the 4th Federal Criminal Court of Roraima, less than five months after the events.

The court sentenced the defendant to 8 years and 11 months, to be served initially in a closed regime, that is, in prison, for the offences under article 2, paragraph 1, of Law No. 8,176/1991 and article 56 of Law No. 9,605/1998, with consecutive sentences. It held that gold in amalgam contains metallic mercury, a toxic substance in any of its forms, and applied the doctrine of wilful blindness to reject the claim that the defendant was unaware of the cargo. The defendant was acquitted of receiving the proceeds of crime, and the Federal Prosecution Service announced an appeal on that point and on reparation for collective moral damages.



CRIMINAL CASE · SEIZURE OF 103 KG OF GOLD		
CASE NUMBER No. 1007266-89.2025.4.01.4200	SEIZURE 103.106 kg in 205 bars	VALUATION R\$ 54,022,394.22
USURPATION 4 years and 10 months of detention and 48 day-fines		TOXIC SUBSTANCE 4 years and 1 month of imprisonment and 41 day-fines

The case also shows the current limit of forensic evidence, since the laboratory established the type of gold seized, but identifying the extraction area depends on reference samples that are not yet available in sufficient number. The investigation into the financiers and the intended recipients of the cargo continues.

Operation Pronta Resposta

On 9 December 2023, two men were arrested in Manaus with about 47 kilograms of gold in bars, 91.25% pure and with no proof of origin. The metal had been flown from Itaituba, in Pará, in a small aircraft and, on arrival, a third group tried to steal the cargo, with shots fired on a public street. At the time, it was the largest seizure of garimpo gold recorded in Amazonas.



Gold seized in Operation Pronta Resposta: 47,080 grams in bars. Source: case file of the operation.

The first indictment was filed in less than a week, jointly with the Special Action Group against Organized Crime and with the support of the Federal Police, the Brazilian Intelligence Agency and the environmental agencies. Four people were convicted, two of attempted robbery with intent to kill (attempted latrocínio), with sentences of 13 years and 3 months and of 7 years and 8 months, and two of transporting the gold. The Federal Prosecution Service appealed against a partial acquittal, and the case is on appeal.



Urupadi National Forest

Between April 2023 and August 2025, according to the indictment, a criminal organization mined gold at the so-called Filão dos Abacaxis, inside the Urupadi National Forest, in Maués, Amazonas. Daily production was estimated at up to six kilograms, with armed security and the use of mercury and cyanide in the Abacaxis River basin. The forensic examination estimated that 71.1 kilograms of gold had been extracted, financial intelligence reports recorded transactions of R\$ 258.6 million, and fifty workers were rescued from slave-like labour.

The investigation, known as Operation Barões do Filão, began with reports from riverine communities and has comprised five operations since 2023. The indictment, accepted by the court in 2026, covers thirteen people in four groups (command, extraction, trading and laundering) and was accompanied by a precautionary freeze of up to R\$ 74.1 million. On the civil side, the public civil action filed in July 2026 seeks R\$ 1.56 billion in damages, together with a recovery plan for the degraded area (Public Civil Action No. 1036394-16.2026.4.01.3200).

An earlier investigation into the same area led to a criminal case for money laundering, in which the Federal Prosecution Service maintains that the origin of 718.5 kilograms of gold, valued at more than R\$ 217 million, was concealed between 2018 and 2020 by means of artisanal mining permits (PLG) whose areas showed no sign of extraction in satellite images. The case is at the closing arguments stage (Criminal Case No. 1024629-19.2024.4.01.3200).

Laundering of ore and proceeds

Three criminal cases illustrate different forms of concealment, beginning with the sale of 73 tonnes of cassiterite, for R\$ 6.09 million, between October 2022 and July 2023, with invoices from a company holding two mining permits in Pará, in whose areas satellite images recorded no extraction. The scheme came to light when the cargo was stolen in a robbery and the insurer demanded proof of origin, and the accounts of the purchasing company handled R\$ 131.8 million in more than three thousand transactions (Case No. 1000762-94.2024.4.01.3200).

In the second, concerning gold extraction on the Mucajaí River, in the Yanomami Indigenous Land, between 2022 and 2023, concealment was carried out through the accounts of relatives and of a company unrelated to the activity. A financial intelligence report recorded transactions of R\$ 47.3 million, and the search and seizure found the mine's account books, in which worker productivity and fuel were priced in grams of gold (Case No. 1006604-96.2023.4.01.4200).

The third deals with the financing of the activity, in an indictment accepted by the court in May 2026 that describes transactions of about R\$ 64 million, between 2017 and 2021, by a group based in Boa Vista. A single legal entity with no employees



and no actual address handled more than R\$ 11 million on its own in just over three years (Case No. 1004325-11.2021.4.01.4200).

There is also a first-instance conviction in a criminal case in Boa Vista concerning the trade in about 7.5 kilograms of gold attributed to garimpo in the Yanomami Indigenous Land and the laundering of more than R\$ 2.2 million through a front company, between 2020 and 2021. The sentences imposed were of four years, in an open regime, and in May 2026 the Federal Prosecution Service appealed for them to be increased (Criminal Case No. 1001497-42.2021.4.01.4200).

Air logistics in the Yanomami Indigenous Land

Operation Urihi Wapopë identified a group dedicated to flying supplies to clandestine garimpos in Roraima and to trading the gold obtained, using helicopters, clandestine airstrips and formal companies to move the money. The findings gathered in that investigation later served as the basis for the public civil action on aerodromes (Criminal Case No. 1008715-87.2022.4.01.4200).

Other investigations follow the same line, such as Operation Buruburu, which is investigating a criminal organization engaged in mining in the Yanomami Indigenous Land and in which individual asset freezes of up to R\$ 5.4 million were upheld by the Federal Regional Court of the 1st Region (the federal court of appeals). In September 2026, an indictment was accepted by the court against two pilots stopped with aircraft bearing altered registration marks and about eight hundred litres of fuel on a clandestine airstrip (Case No. 1000646-95.2024.4.01.4200). In Operation Ouro Negro, which began with the seizure of two tonnes of cassiterite shipped by a regular airline, the precautionary measures of March 2025 were likewise upheld on appeal.

Diamonds

Operation Adamas investigated the extraction of diamonds without valid authorization in southern Amazonas, between 2013 and 2019, with false documents submitted to the mining regulator, including in applications for certificates under the Kimberley Process, the international mechanism created to prevent trade in stones of illicit origin. In August 2025, the federal court accepted the indictment and suspended the mining company's activities (Case No. 1012115-73.2020.4.01.3200).

In Rondônia, Operation Oraculum found, in May 2023, a diamond garimpo in operation in the Roosevelt and Parque Aripuanã Indigenous Lands, with a camp of about fifteen miners (garimpeiros). The indictment against the person accused of leading the activity was accepted by the court in August 2026 (Criminal Case No. 1002291-87.2026.4.01.4103).



Sand, gravel and limestone

The work also covers the clandestine extraction of minerals used in construction. In Vilhena, in Rondônia, a public civil action filed in May 2026 seeks at least R\$ 5.4 million in compensation and R\$ 5 million in collective moral damages for the removal of 137,000 cubic metres of sand, gravel and clayey gravel from federal public land, which continued after embargoes and infraction notices (Public Civil Action No. 1001572-08.2026.4.01.4103). In Porto Velho, another action concerns the extraction of 15,000 cubic metres of lateritic soil in a permanent preservation area on the bank of the Madeira River (Public Civil Action No. 1036702-52.2026.4.01.3200).

In Manaus, in 2025, the federal court suspended the expansion works of a shipyard charged with extracting sand and clay without a valid licence on the banks of the Tarumã-Açu stream (Criminal Case No. 1001233-13.2024.4.01.3200). In Pimenta Bueno, in Rondônia, the Federal Prosecution Service argues in a public civil action that limestone quarrying destroyed about 220 metres of interconnected caves without an environmental impact study, and it seeks R\$ 8 million in collective moral damages (Public Civil Action No. 1000290-76.2019.4.01.4103).

Indigenous lands and protected areas

Tenharim do Igarapé Preto Indigenous Land

Cassiterite mining uncovered in Operation Warã II, with environmental damage estimated at R\$ 38 million. Indictment accepted by the court in February 2025.

Case No. 1015889-14.2020.4.01.3200

Tenharim Marmelos Indigenous Land

Extraction of gold and cassiterite between 2020 and 2023, with the clearing of 108 hectares of forest, investigated in Operation Intruso. Public civil action of May 2026 and indictment accepted by the court in September 2026.

Cases No. 1024296-96.2026.4.01.3200 and No. 1029410-21.2023.4.01.3200

Zoró Indigenous Land

Garimpo and deforestation investigated in Operation Kaapora, with charges of exploiting and transporting raw material belonging to the Union and of criminal association. Indictment accepted by the court.

Case No. 1000671-22.2021.4.01.4101

Mapinguari National Park

Cassiterite mining active until July 2023, with the clearing of at least 39 hectares, found in Operation Oportunidade V. Indictment accepted by the court in July 2026 and public civil action filed in May 2026, seeking more than R\$ 3.1 million.

Case No. 1037338-86.2024.4.01.3200 and Public Civil Action No. 1024297-81.2026.4.01.3200



Campos Amazônicos National Park

Cassiterite extraction in an industrial-scale structure, with 36.77 hectares degraded, caught in the act in Operation Ramus, in April 2025. Indictment accepted by the court in September 2026.

Criminal Case No. 1014822-04.2026.4.01.3200

Transnational trade in gold and diamonds

Organization that traded gold and stones between Boa Vista and Lima, Peru, in 2018, investigated in Operation Assucena. Indictment accepted by the court in May 2026.

Criminal Case No. 1003754-74.2020.4.01.4200

Violence against public officials

Three indictments for attempted aggravated murder of public officials on duty have been filed in Roraima. Two concern federal teams on missions against garimpo in the Yanomami Indigenous Land. In 2022, on the upper Mucajaí River, a boat loaded with fuel and weapons advanced towards officers of the National Public Security Force, and in 2023, on the Uraricoera River, a vessel from a convoy carrying cassiterite rammed the boat of IBAMA inspectors three times. One of these cases is before the federal jury court, an uncommon situation in the federal courts (Case No. 1004743-75.2023.4.01.4200). The third indictment, accepted by the court in February 2026, concerns a man who fired four times in the direction of state military police officers while fleeing with two tonnes of cassiterite, in Mucajaí (Criminal Case No. 1008331-90.2023.4.01.4200).

Agreements in criminal matters

In less serious cases, the non-prosecution agreement has been used to direct resources to the enforcement agencies. In March 2026, two agreements approved by the federal court in Amazonas secured the donation of equipment to IBAMA and to the Federal Police's environmental investigations group by persons accused of transporting and storing minerals extracted without authorization. In one of them, signed with a foreign national, the agreement was translated into English and the confession was taken at a virtual hearing.

FURTHER READING (IN PORTUGUESE)

- [Forja de Hefesto: decision requires proof of the origin of the cassiterite](#)
- [Forja de Hefesto: freeze of up to R\\$ 146 million](#)
- [Forja de Hefesto: R\\$ 1.7 billion action](#)
- [Conviction in the case of the 103 kg of gold](#)
- [Operation Pronta Resposta](#)
- [Urupadi National Forest: indictment](#)
- [Urupadi National Forest: reparation action](#)
- [Operation Adamas](#)



8

Institutional representation

The work described in the previous chapters is accompanied by participation in public hearings, technical bodies and international organizations, in which the Federal Prosecution Service was represented by federal prosecutor André Luiz Porreca Ferreira Cunha. The entries below are limited to institutional representation events with a direct bearing on the cases and proposals presented in this report.

International organizations

11

MAR. 2026

Inter-American Commission on Human Rights

GUATEMALA · 195TH PERIOD OF SESSIONS

Public hearing on the impacts of illegal mining on economic, social, cultural and environmental rights, by designation of the International Cooperation Secretariat. In April 2026, the Federal Prosecution Service sent the Commission's special rapporteurship written submissions on mercury contamination, the growing use of cyanide and the lack of a national monitoring system.

12

MAR. 2026

United Nations Office on Drugs and Crime (UNODC)

BRASÍLIA

Fourth meeting of the working group on illegal gold mining in Brazil, under the Aurum project. The group discussed protocols for the safe disposal of seized mercury and cyanide and set the control of heavy machinery as the priority for 2026.

7 to 10

JUL. 2026

Workshop of UNODC and IBAMA (the federal environmental agency)

BRASÍLIA

First workshop on environmental contamination resulting from illegal gold mining, with a presentation on the Federal Prosecution Service's recommendations for the control of mercury and cyanide and on the Rede sem Mercúrio (Mercury-Free Network) project.

7

OCT. 2026

Workshop of the United Nations Interregional Crime and Justice Research Institute (UNICRI) and the OECD

BRUSSELS

Meeting on traceability and the criminal justice response to mineral crimes through South-South cooperation, held alongside the global conference of the Extractive Industries Transparency Initiative. The presentation covered the Brazilian traceability system and the cases of the seizure of 103 kilograms of gold and of Operation Forja de Hefesto.



National Congress and the executive branch

5

MAY 2026

Chamber of Deputies

BRASÍLIA

Public hearing of the Committee on the Amazon and Original and Traditional Peoples on the impacts of mercury use. The presentation argued for implementation of the Minamata Convention, repeal of the 1989 decrees and passage of a law banning the substance in mining.

13

MAY 2026

Minamata Convention working group

BRASÍLIA

Presentation of Technical Note No. 1/2025 to the body of the National Chemical Safety Commission that monitors implementation of the Convention, in which the Federal Prosecution Service takes part by designation of the Prosecutor General's Office. The session was preceded by a meeting with the Ministry of the Environment and Climate Change on 29 April and followed by the extraordinary sessions of 28 May and 17 June on the draft national action plan.

1 and 2

JUL. 2026

Ouro sem Mercúrio seminar

BRASÍLIA

Event held by the Ministry of Mines and Energy on the national action plan for artisanal and small-scale gold mining. The presentation dealt with the participation of Indigenous peoples and traditional communities in drawing up the plan.

28 and 29

JUL. 2026

Meetings with IBAMA and ICMBio (the federal protected-areas agency)

BRASÍLIA

Technical meetings organized by the 4th Chamber for Coordination and Review (the Federal Prosecution Service's body for environmental and cultural heritage matters), at the Prosecutor General's Office, on the nationwide standardization of infraction notices and inspection reports on illegal garimpo.

Agencies, armed forces and neighbouring countries

13 and 14

JAN. 2025

Agenda in Roraima

BOA VISTA

Visit to the federal coordination centre in Roraima (Casa de Governo), which coordinates the removal of miners (garimpeiros) from the Yanomami Indigenous Land, and meetings with the Air Force and the National Civil Aviation Agency (ANAC), on clandestine airstrips, and with the Federal Police and the Federal Highway Police. The agenda included a meeting with the consul general of Guyana.

JAN. 2025

Border with Colombia and Peru

TABATINGA AND ATALAIA DO NORTE

Meeting with the consular representation of Colombia, on obtaining documents relating to persons under investigation, and dialogue with Indigenous leaders of the Javari Valley.

**17**

FEB. 2025

IBAMA**WORKING MEETING**

Meeting with the state offices and the General Coordination for Enforcement on guidelines for the infraction notices drawn up in garimpo cases, which preceded Recommendation No. 5/2025.

2 to 5

DEC. 2025

Federal Police international seminar**BRASÍLIA**

Second edition of the seminar on illicit activities and traceability in the gold supply chain, at the National Institute of Criminalistics (the Federal Police forensic laboratory), with participation in the panel on the criminal prosecution of illegal mining.

10

DEC. 2025

Brazilian Navy**9TH NAVAL DISTRICT**

Meeting with the naval command, at which it was settled that owners of garimpo vessels would be held administratively liable on the basis of indirect evidence.

MAY 2026

Prosecution service of Colombia**VIRTUAL MEETING**

Talks on the creation of joint investigation teams on garimpo in border rivers, with the International Cooperation Secretariat.

21

MAY 2026

Amazon regional cooperation**MANAUS**

Workshop on security and sustainability in the regional cooperation agenda, at CENSIPAM, the federal centre that manages the Amazon protection system, with authorities from Colombia, Peru, Guyana and French Guiana.

28

MAY 2026

CENSIPAM**MANAUS**

Meeting on technological cooperation, with emphasis on the revitalization of the system for locating radio transmissions and on the use of satellite images to identify shipyards.

JUL. 2026

Brazilian Mining Institute**VIRTUAL MEETING**

Dialogue with the body that represents the mining sector on traceability and alternatives to mercury.

Public hearings and communication with society

18

AUG. 2025

National Council of the Prosecution Service (CNMP)**LIVE BROADCAST**

Presentation of Operation Pronta Resposta on the programme Diálogos Ambientais, of the Council's Environmental Protection Committee.



6 and 7

OCT. 2025

Social and environmental impacts of garimpo in Amazonas

VIRTUAL HEARINGS

Conduct of the public hearings that preceded the recommendation and the structural action described in chapter 3, with the participation of public bodies, researchers, Indigenous peoples, civil society organizations and miners.

9

JUN. 2026

Rede sem Mercúrio videocast

MPF CHANNEL

Interview on the removal of mercury advertisements from digital platforms and on the effects of the substance on Indigenous peoples, riverine communities and aquatic ecosystems.

JUL. 2026

International Congress of Investigative Journalism

SÃO PAULO

Panel on organized crime and illegal garimpo in the Amazon, at the 21st edition of the congress of the Brazilian Association of Investigative Journalism (ABRAJI), held from 30 July to 1 August.

Internal bodies and meetings

The prosecutor is a member of the working groups on Mining Dams, of the 4th Chamber for Coordination and Review, and on Ports and Airports, of the 2nd Chamber, which deals with criminal matters, where he is responsible for the statistics on the illegal transport of minerals. At the meetings of the institution, the legal arguments and model filings developed in the cases are presented to other prosecutors.

6

AUG. 2025

Regional Criminal Meeting of the 1st and 5th Regions

BRASÍLIA

Presentation of the activities of the Ports and Airports Working Group, set up by the 2nd Chamber for Coordination and Review in March 2025.

1 and 2

OCT. 2025

National Meeting of the 2nd Chamber for Coordination and Review

CURITIBA

Presentation of the Rede sem Mercúrio project in the session on good practices.

29

SEPT. 2026

Meeting on the judicial work of the Federal Prosecution Service

BRASÍLIA

Panel of the 4th Chamber for Coordination and Review on linking civil and criminal liability and on combating organized crime, with a presentation of the article 56 theory (Law No. 9,605/1998) applied to gold with residual mercury and of the use of Law No. 12,846/2013 in illegal mining.



Awards and recognition

Tecnologia a favor da Amazônia
Acordo entre o MPF e a Starlink

O acordo enfrenta o uso da internet satelital como suporte logístico ao garimpo ilegal na Amazônia e cria mecanismos de identificação, rastreabilidade e cooperação com as autoridades.

- O que foi o caso?**
O MPF instaurou inquérito civil em maio de 2024 para apurar o uso de antenas Starlink em áreas de garimpo ilegal.
- O resultado foi o Termo de Compromisso nº 3/2025, firmado em 23 de junho de 2025: o primeiro acordo formal de Starlink com autoridades brasileiras.
- A solução tem alcance sobre os nove estados da Amazônia Legal e foi homologada pela 4ª Câmara de Coordenação e Revisão do MPF em 31 de julho de 2025.

Publicity material for the finalist project (in Portuguese). MPF and ANPR.

XIV República Award

NATIONAL ASSOCIATION OF FEDERAL PROSECUTORS (ANPR) • 17 JUNE 2026

Winner in the category Combating crime and other unlawful acts

The agreement with Starlink, authored by federal prosecutor André Luiz Porreca Ferreira Cunha, received the award at a ceremony at the Prosecutor General's Office, in Brasília, and also competed for the Society Award, decided by popular vote.

Selo de Excelência Ambiental 2024

Seal artwork. CNMP.

Environmental Excellence Seal

NATIONAL COUNCIL OF THE PROSECUTION SERVICE (CNMP) • 28 NOVEMBER 2024

Category Highlights 2024

In the first edition of the seal, granted by the Council's Environment Committee to 27 projects, the work against illegal mining was among the four highlights of the year, at a ceremony at the Council's headquarters, in Brasília.

In addition to these two distinctions, in October 2025, at the Forum of Prosecutors General for COP30, in Belém, Operation Pronta Resposta, the Rede sem Mercúrio project and the agreement with Starlink were cited by the Deputy Prosecutor General among the actions of the Federal Prosecution Service in the Amazon.

FURTHER READING (IN PORTUGUESE)

- Hearings of the Inter-American Commission on Human Rights
- Submissions sent to the Inter-American Commission
- Meeting of the UNODC working group
- UNODC workshop on contamination
- Public hearing in the Chamber of Deputies
- Ouro sem Mercúrio seminar
- Joint teams with the prosecution service of Colombia
- República Award
- Environmental Excellence Seal (in Portuguese)



9

Final remarks

The cases gathered in this report share the finding that illegal mining depends on goods, services and documents supplied by the formal economy. It is at those points that the Federal Prosecution Service has sought results more lasting than those obtained through enforcement at the extraction site alone.

Summary

On each front, the consensual route was the first option, and the recommendations and conduct adjustment agreements led to the repeal of state rules that allowed mercury, the suspension of gold extraction licences, the amendment of a national rule on the sale of seized minerals, the removal of mercury advertisements from the main digital platforms and the agreement on satellite internet. Court action was reserved for cases of refusal or lack of response, always with claims aimed at correcting the failure identified.

By that second route, the federal courts have already ordered continuous inspection of aviation fuel, the preparation of plans for the Guajará-Mirim river port and for the surroundings of an Indigenous land in Rondônia, the start of the studies on the criteria that distinguish exploration from mining, and the review of licences and titles as regards the use of mercury and cyanide. In Operation Forja de Hefesto, the court required a smelter and a cooperative to prove the origin of the ore lot by lot and ordered a freeze on the assets of the defendant companies.

In criminal matters, the indictments reach the different roles in the chain, from transport to financing and the laundering of the proceeds, and the judgments obtained recognize the offence relating to the mercury transported with the gold as a separate one. The reparation claims made in the criminal cases and in the public civil actions seek to strip the activity of the capital that allows dredges, aircraft and fuel to be replaced after each operation.

Pending agenda

A significant share of the measures awaits a judicial or administrative decision, such as the requests for interim relief in the actions on coordination among the agencies in Amazonas, on the artisanal mining permit (PLG) regime, on clandestine



aerodromes and on the monitoring of mercury contamination. Responses are also pending to the recommendations addressed to the maritime authority and to the bodies responsible for tin traceability.

REGULATORY AGENDA

- Full traceability of gold, the subject of Bill No. 3,025/2023, passed by the Chamber of Deputies and pending in the Federal Senate.
- Mercury regime, with the repeal of Decrees No. 97,507/1989 and No. 97,634/1989 and the consideration of Bills No. 2,417/2024 and No. 1,011/2023.
- Regulation of the artisanal mining permit regime, with eligibility criteria and physical proof of mining.
- Control of mineral origin at export and creation of a tracing system for cassiterite (tin ore) and tin.
- Keeping the first purchase of gold exclusive to institutions authorized by the Central Bank, under discussion in Bill No. 6,432/2019.

Cooperation with other countries is part of this agenda, because ore, inputs and money cross borders, and proof of origin depends on reference samples, customs data and swift responses to requests for mutual legal assistance. The pleadings, decisions and data mentioned in this report are public and can be consulted using the case numbers listed in the annex, and the Federal Prosecution Service remains at the disposal of national and foreign institutions interested in them.



ANNEX

Table of cases and proceedings

The table lists the main cases and proceedings mentioned in the report, with the status recorded in the sources consulted up to 7 October 2026. Cases under seal are not included.

Public civil actions

Topic	Case number	Subject matter and status
Garimpo in Amazonas	No. 1040474-23.2026.4.01.3200	Structural action against the Union (the federal government), the State of Amazonas, IBAMA, ICMBio, FUNAI (the federal agency for Indigenous peoples) and IPAAM (the Amazonas state environmental agency). Interim relief pending
Exploration and mining	No. 1004745-67.2025.4.01.3200	Objective criteria to distinguish the two. Partial interim relief of December 2025, with 180 days for the studies
Artisanal mining permits	No. 1036996-07.2026.4.01.3200	Regulation and nationwide reassessment of the permits. Interim relief pending
Mercury and cyanide in licences and titles	No. 1008771-90.2026.4.01.4100	State of Rondônia and National Mining Agency (ANM). Interim relief granted on 15 August 2026
Mercury monitoring	No. 1048878-63.2026.4.01.3200	National monitoring system. Action filed in September 2026
Clandestine aerodromes	No. 1041349-27.2025.4.01.3200	Integrated plan to identify and disable airstrips. Interim relief pending
Aviation fuel	No. 1001829-67.2025.4.01.4200	Judgment granting the claims, of 11 December 2025. Appeal pending
Garimpo vessels	No. 1004207-86.2025.4.01.3200	Sanctioning power of the maritime authority. Interim relief granted in 2025
Guajará-Mirim port	No. 1004553-19.2026.4.01.4100	Integrated inspection plan within 90 days. Partial interim relief of 29 April 2026
Social media content	No. 1009022-02.2026.4.01.4200	Preventive notice and detection plan. Interim injunction denied, with appeal pending
Surroundings of the Uru-Eu-Wau-Wau Indigenous Land	No. 1005503-62.2025.4.01.4100	Territorial protection plan. Interim relief of 27 June 2025
Forja de Hefesto, reparation	No. 1010705-74.2026.4.01.4200	Reparation and lot-by-lot verification of origin. Partial interim relief of 17 September 2026
Forja de Hefesto, Law No. 12,846/2013	No. 1011028-79.2026.4.01.4200	Sanctions against four legal entities. Asset freeze ordered on 18 September 2026
Urupadi National Forest	No. 1036394-16.2026.4.01.3200	Reparation of R\$ 1.56 billion. Action filed in July 2026



Topic	Case number	Subject matter and status
Tenharim Marmelos Indigenous Land	No. 1024296-96.2026.4.01.3200	Recovery of the area and damages. Action filed in May 2026
Mapinguari National Park	No. 1024297-81.2026.4.01.3200	Reparation of more than R\$ 3.1 million for cassiterite mining. Action filed in May 2026
Sand and gravel in Vilhena	No. 1001572-08.2026.4.01.4103	Compensation of at least R\$ 5.4 million and collective moral damages. Action filed in May 2026
Igarapé Mutum dam	No. 1001987-34.2025.4.01.4100	Dam safety and exercise of regulatory enforcement powers
Jacaré dams	No. 1025324-52.2025.4.01.4100	Compliance with technical requirements. Shifting of the burden of proof granted
Structures in Oriente Novo	No. 1012834-61.2026.4.01.4100	Reparation for the 2019 breach

Criminal cases

Case	Case number	Subject matter and status
Forja de Hefesto	No. 1003352-22.2022.4.01.4200	Cassiterite and gold from the Yanomami Indigenous Land. Indictment accepted by the court on 17 August 2026
Seizure of 103 kg of gold	No. 1007266-89.2025.4.01.4200	Sentence of 8 years and 11 months, on 15 December 2025
Pronta Resposta	No. 1009980-49.2024.4.01.3200	Attempted robbery with intent to kill (attempted latrocínio) of a gold cargo. Convictions at first instance, under appeal
Gold laundering in Urupadi	No. 1024629-19.2024.4.01.3200	Concealment of the origin of 718.5 kg of gold. Closing arguments
Cassiterite with simulated origin	No. 1000762-94.2024.4.01.3200	Sale of 73 tonnes with invoices from permits with no mining
Mucajáí River	No. 1006604-96.2023.4.01.4200	Gold extraction and laundering through third-party accounts
Financing of garimpo	No. 1004325-11.2021.4.01.4200	Transactions of R\$ 64 million. Indictment accepted by the court in May 2026
Gold trade and laundering in Boa Vista	No. 1001497-42.2021.4.01.4200	First-instance conviction, with sentences of four years. Appeal by the Federal Prosecution Service for heavier sentences
Urihi Wapopë	No. 1008715-87.2022.4.01.4200	Air logistics for garimpos in the Yanomami Indigenous Land
Adamas	No. 1012115-73.2020.4.01.3200	Diamonds and Kimberley Process Certificate. Indictment accepted by the court in August 2025
Oraculum	No. 1002291-87.2026.4.01.4103	Diamonds in Indigenous lands in Rondônia. Indictment accepted by the court in August 2026
Attempted murder of federal officials	No. 1004743-75.2023.4.01.4200	Federal jury court
Shots fired at police officers in Mucajáí	No. 1008331-90.2023.4.01.4200	Indictment accepted by the court in February 2026



Agreements and out-of-court proceedings

Topic	Reference	Subject matter and status
Satellite internet	Agreement No. 3/2025	Agreement with Starlink, approved on 31 July 2025. Under implementation
Rede sem Mercúrio	Four agreements and nine recommendations	Mercado Livre, OLX, B2Brazil and Alibaba.com, as well as the other platforms. Periodic checks
Rules on mercury	Civil Inquiry No. 1.13.000.002527/2023-60	Repeal of the Amazonas rules and technical note on the 1989 decrees
Replacement of mercury	Recommendation No. 6/2026	National technological transition programme. Awaiting responses
Minamata action plan	Recommendations No. 8/2026 and No. 9/2026	Social participation and consultation of Indigenous peoples
Seized minerals	Civil Inquiry No. 1.13.000.000452/2025-44	Recommendation accepted, with the issue of ANM Resolution No. 222
Dredges and barges	Recommendation No. 5/2026	Six measures proposed to the maritime authority
Cassiterite and tin	Recommendation of 27 February 2026	National tracing system. Awaiting responses
Infraction notices	Recommendations No. 5/2025 and No. 6/2025	Minimum content of the notices. Accepted in 2025, with proposals for an agreement in 2026
Highway inspection	Recommendation No. 2/2024	Vehicle scanners for the Federal Highway Police in Roraima and Rondônia. Accepted
Cyanide	Recommendations No. 25/2025 and No. 26/2025	Remediation of contaminated areas in the Raposa Serra do Sol Indigenous Land
Madeira and Tonantins rivers	Recommendations No. 17/2025 and No. 2/2026	Emergency plans for State presence
Waimiri Atroari Indigenous Land	Civil Inquiry No. 1.13.000.002675/2025-46	Contamination of rivers. Recommendation of July 2026



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Federal Prosecution Service · Offices specialized in illegal mining

Organized by the office of federal prosecutor André Luiz Porreca Ferreira Cunha.

This edition closed on 7 October 2026. The actions mentioned are ongoing, unless otherwise indicated, and the accused are presumed innocent until a final decision.

Photographs: Federal Prosecution Service archive, unless otherwise indicated in the caption.