

United States Senate

WASHINGTON, DC 20510

September 4, 2026

The Honorable Mike Waltz
Ambassador
United States Mission to the United Nations
799 United Nations Plaza
New York, NY 10017

Dear Ambassador Waltz,

As the United Nations (UN) Security Council considers the renewal and possible expansion of the Sudan sanctions regime, we write to request that the U.S. Mission put forth additional measures that would target key funding sources actively enabling the horrific violence in Sudan. The recent proposal from U.S. Senior Advisor for Arab and African Affairs Massad Boulos to expand the scope of the Darfur arms embargo to the entirety of the country is encouraging. We also appreciate his recognition that external financial support to all parties remains a driver of conflict and agree that the UN has the tools to address these issues.¹ We therefore urge the U.S. Mission to engage accordingly and advocate for the passage of additional provisions to eliminate financial channels that belligerents depend on to perpetuate the conflict.

Specifically, any resolution put forward to renew sanctions pursuant to United Nations Security Council Resolution 1591 (2005) should also prohibit the export or transfer of precursor chemicals used in Sudan's artisanal mining industry, target the illicit sale of Sudanese gum arabic (also known as *acacia* gum), and improve reporting by the Panel of Experts to explicitly identify arms embargo violations and the parties responsible.

Gold is widely considered the most significant source of income and foreign currency for both sides of Sudan's war, which use the proceeds to purchase weapons and compensate personnel.² The Treasury Department has previously targeted operatives in the RSF's financial network that facilitate the sale of gold, recognizing the role that the sector plays in funneling cash to the militia group.³ However, restrictions meant to disrupt transactions at the point of sale must be combined with a coordinated effort to restrict access to the precursor chemicals that enable unregulated gold extraction in the first place. This is especially critical to curtail other sources of profit tied to the gold sector but outside material sales, such as informal taxation schemes, security fees, and transportation fees levied against mining firms in RSF-held territory.⁴

¹ "Remarks at a UN Security Council Briefing on the Situation in Sudan." *The United States Mission to the United Nations*, 24 August 2026, <https://usun.usmission.gov/remarks-at-a-un-security-council-briefing-on-the-situation-in-sudan/>

² Walsh, Declan. "The Gold Rush at the Heart of a Civil War." *The New York Times*, 11 December 2024, <https://www.nytimes.com/2024/12/11/world/africa/sudan-gold-rush-heart-civil-war.html>

³ "Treasury Sanctions Sudanese Paramilitary Leader, Weapons Supplier, and Related Companies." *United States Department of the Treasury*, 7 January 2025, <https://home.treasury.gov/news/press-releases/jy2772>

⁴ "Bullion For Bullets: The Role of Mining in Sudan's Conflict Economy." *C4ADS*, 27 May 2025, <https://c4ads.org/reports/bullion-for-bullets/>

Although it is difficult to determine precise figures because a substantial amount of Sudan's gold is smuggled out of the country and gold production in RSF-controlled territory is not reported, artisanal and small-scale gold mining (ASGM) operations account for approximately 80-90% of Sudan's gold production.⁵ ASGM mining employs various methods of extraction, but it typically relies on mercury and sodium cyanide as relatively cheap and simple chemicals to easily find and process gold particles. In addition to the chemicals' vital role in the wartime economy, numerous studies have found prolonged exposure can lead to severe health complications and is harmful to the local environment.⁶ According to a 2025 report, most of these precursor chemicals are imported from China, the United Arab Emirates, and some European Union (EU) nations. While the EU recently unveiled a suite of regulations restricting the sale of precursor chemicals to Sudan, the diverse supply chain necessitates a more comprehensive prohibition to eliminate the transfer of mercury and sodium cyanide to ASGM miners. Adoption of an export ban on mercury and sodium cyanide as part of the Security Council's Sudan sanctions regime, with appropriate exceptions for humanitarian purposes, would help sever the link between the gold sector and the ongoing conflict.

Gold is not the only natural resource being exploited to fund the war. As documented by the UN Office of the High Commission for Human Rights, revenue tied to gum arabic production is small relative to gold, but profits from its sale and control over of trade networks now help sustain the conflict.⁷ Sudan was one of the world's largest exporters of gum arabic prior to 2023, but widespread disruption to the industry has caused output to plummet and its value to skyrocket. Consequently, the RSF has engaged in looting and extortion to exert control over trade routes and border crossings, leveraging the proceeds to bankroll their side of the war. Cross-border smuggling and re-labelling of Sudanese gum arabic to avoid heightened scrutiny about sourcing is also pervasive in neighboring countries such as Chad, South Sudan, and Egypt.⁸ As the Security Council has done in response to other conflicts where natural resource exploitation has contributed to instability, it should mandate the Panel of Experts to develop due diligence guidelines to improve gum arabic procurement practices, prevent smuggled products from entering the supply chain, and avoid inadvertently enriching the belligerents.

Finally, we encourage the U.S. to ensure the Panel of Experts' extended mandate requires annual reporting that includes explicit documentation of all violations of the arms embargo and the parties responsible. Given the outsized role that external actors play in shaping the war, the Panel must improve transparency about the transfer of arms and financial support to the warring parties, including engagement with illicit gold smugglers. Reporting by other UN-sanctioned panels, including the Panel of Experts on Libya, demonstrate a level of naming and shaming that the Sudan panel should strive for. Countries who blatantly circumvent the arms embargo and

⁵ "African Gold Report – Sudan." *SWISSAID*, 20 May 2025, <https://www.africangoldreport.org/sudan>

⁶ Abdelrahman, Mohamed Salah. "Sudan's Gold Curse Briefing Paper No. 1: How Mercury is Poisoning a Nation." *Sudan Transparency and Policy Tracker*, October 2022, https://sudantransparency.org/wp-content/uploads/2023/02/MercuryBrief_FINAL.pdf

⁷ "Briefing Paper – Business and Human Rights in Conflict: Gum Arabic from Sudan." *United Nations Office of the High Commissioner for Human Rights*, 15 July 2026, <https://www.ohchr.org/sites/default/files/documents/countries/sudan/2026-07-15-sudan-trend-analysis-report.pdf>

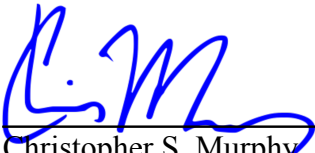
⁸ "Final report of the Panel of Experts on the Sudan." *United Nations Security Council*, 17 April 2025, <https://docs.un.org/en/S/2025/239>

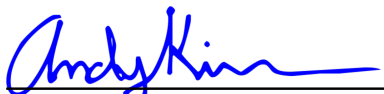
other UN restrictions to prolong the conflict cannot be permitted to continue hiding their role and must be publicly held to account for their actions.

The war in Sudan is now into its fourth year. A straight renewal of the UN Security Council Resolution on Sudan that maintains the status quo will not bring an end to the unimaginable violence and devastation that has affected millions of Sudanese. The international community should urgently adapt its strategy to creatively deploy the entire range of tools at its disposal. Coordinated, comprehensive measures to increase the pressure on the economic engine of the war, particularly on natural resources supply chains, can raise the cost of the war, making it too costly and burdensome to continue. In the coming weeks, we hope that you and your team at USUN will consider incorporating these solutions into any forthcoming resolution to provide for the continuation and possible expansion of the Sudan sanctions measures.

Thank you for your consideration.

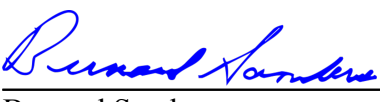
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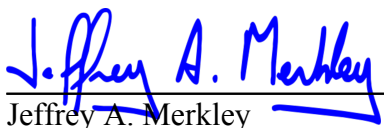


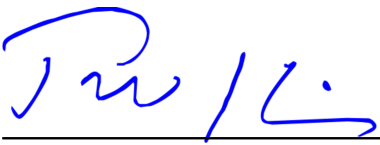
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United States Senator

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United States Senator

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