UNITED NATIONS
HUMAN RIGHTS
OFFICE OF THE HIGH COMMISSIONER
Sudan

Briefing Paper

Business and Human Rights in Conflict: Gum Arabic from Sudan

1. Introduction

1. On 15 April 2023, Sudan witnessed the outbreak of a devastating conflict between the Sudanese Armed Forces (SAF) and the Rapid Support Forces (RSF). From its outset, the conflict has been marked by a blatant disregard for international humanitarian law (IHL) and international human rights law (IHRL), with indiscriminate and direct attacks on civilians and civilian infrastructure, including through the use of drones, widespread sexual violence, as well as retaliatory violence along ethnic lines.[1]

2. At the same time, the conflict has severely undermined the enjoyment of economic, social and cultural rights, which were already under serious strain prior to the conflict. Sudan is facing catastrophic levels of food insecurity, with around 19.5 million people in IPC Phase 3 or above;[2] the largest displacement crisis globally, with nearly 15 million displaced;[3] and the collapse of essential services, with health, water and education systems no longer functioning in many areas, or operating with extremely limited capacities.[4]

3. Amid this context of persistent violations of IHL and IHRL, collapse of basic services, and continued civilian suffering, the conflict in Sudan has become increasingly self-perpetuating, sustained in part by economic practices linked to the control and exploitation of territory, trade routes and commodities.[5]

4. Beyond external military support and transfers of weapons and related supplies, which continue to play a significant role in sustaining the conflict,[6] parties to the conflict have also relied on revenues generated in Sudan. These include revenues linked to gold, livestock and other agricultural commodities, through their extraction, movement and export, as well as formal and informal payments imposed along trade routes, making these commodities part of Sudan's war economy.

5. In this context, serious human rights concerns arise not only from the ways in which parties to the conflict generate and control revenues, but also from the ways in which economic actors and commodity value chains may interact with, benefit from, or be exposed to conflict-related human rights impacts.

6. Against this backdrop, this briefing paper focuses on gum arabic as a case study. Despite its relatively modest economic value in export terms compared to extractive resources such as gold, gum arabic remains one of Sudan's most internationally relied upon exports and continues to be an important source of income for millions of Sudanese.[7] Prior to the conflict, the country accounted for roughly 70 to 80 per cent of global crude gum arabic exports, creating a significant level of international supply reliance on Sudan.[8] Since the outbreak of the conflict, disruption to Sudan's gum arabic value chain has had implications for global supply, contributing to price increases and heightening traceability and responsible-sourcing concerns for industries that source or use gum arabic, including the food and beverage, confectionery, pharmaceutical and cosmetic

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[1] See OHCHR Sudan report, *Human Rights Situation in the Sudan, 1 January to 30 June 2025*: https://www.ohchr.org/en/documents/country-reports/human-rights-situation-sudan-1-january-30-june-2025; see also *Situation of human rights in the Sudan: Report of the United Nations High Commissioner for Human Rights*, A/HRC/61/24, 13 January 2026: https://docs.un.org/en/A/HRC/61/24; see also https://www.ohchr.org/en/countries/sudan

[2] See IPC Acute Food Insecurity Analysis, February 2026 - January 2027, https://reliefweb.int/report/sudan/sudan-ipc-acute-food-insecurity-analysis-l-february-2026-january-2027-published-3-june-2026

[3] See https://reliefweb.int/report/sudan/sudan-three-years-conflict-and-displacement.

[4] See supra n. 1.

[5] Contemporary civil wars have increasingly become self-financing in nature, sustained by economic practices such as predatory taxation, resource exploitation, and other extra-institutional revenue mechanisms that enable parties to maintain military and political operations even as formal State institutions collapse. See Karen Ballentine and Heiko Nitzschke, *The Political Economy of Civil War and Conflict Transformation* (Berghof Research Center for Constructive Conflict Management, 2005), pp. 1, 7-9. See also the war economy section of this report for further analysis of the resource-linked economic dynamics that contribute to sustaining the conflict.

[6] See supra n. 1, A/HRC/61/24, paras. 13–14; see also OHCHR, "High Commissioner Türk calls for urgent joint action on Sudan", remarks to the Conference on Sudan, Berlin, 15 April 2026.

[7] For further information on gum arabic production, export value, livelihood significance, and the pre-conflict structure of Sudan's gum arabic value chain, see section 5.1, paras. 34-40 of this report.

[8] Ibid.

sectors. This is particularly relevant given that Sudan's gum arabic production belt extends across areas heavily affected by the conflict, where serious violations of IHL and IHRL have been documented. Companies in the downstream gum arabic value chain, including processors, suppliers, manufacturers and brands whose products use gum arabic as an input, may therefore be linked to a value chain affected by conflict-related adverse human rights impacts.

7. This briefing paper highlights the human rights risks associated with sourcing from Sudan as a conflict-affected context, as illustrated through the gum arabic value chain. It calls for stronger action by States and businesses to strengthen accountability and traceability, and to support heightened human rights due diligence and responsible sourcing practices.

2. Methodology

8. On 25 September 2019, the Office of the United Nations High Commissioner for Human Rights (OHCHR) and the Government of the Republic of the Sudan signed an Agreement to establish an OHCHR Country Office in Sudan. Pursuant to this Agreement, and in accordance with the High Commissioner's global mandate under United Nations General Assembly resolution 48/141, OHCHR Sudan Country Office monitors and reports on the human rights situation in Sudan.

9. This briefing paper draws on a combination of desk-based review and remote interviews. The desk review covered a wide range of United Nations and international organization documents and reports, as well as independent investigative and academic studies and articles on Sudan's political economy and the gum arabic sector. Remote interviews were conducted with business and economic experts, gum arabic producers, exporters and transporters, journalists, and human rights monitors. Information obtained was cross-checked and corroborated in accordance with OHCHR methodology and applicable standards of proof.

10. OHCHR's standard human rights monitoring methodology, including the principle of "do no harm" and the evidentiary threshold of reasonable grounds to believe was applied throughout.[9]

3. Normative framework

3.1 Parties to the conflict

11. A non-international armed conflict has been ongoing in Sudan since 15 April 2023 between the SAF and the RSF, supported by their respective allied armed movements and groups. All parties to the conflict are bound by applicable IHL.[10] In addition, IHRL continues to apply to Sudan.[11] In situations of armed conflict, IHRL and IHL are complementary and not mutually exclusive.[12] Where organized non-State armed groups exercise control over territory and populations, and perform governance-like functions, they are expected, in addition to compliance with IHL, to respect human rights.

3.2 Other States

12. International law also speaks to obligations of third States, including in their relations with parties to armed conflicts, and with respect to business-related human rights violations and abuses and human rights impacts occurring outside their territory, among others. Importantly, IHRL imposes obligations on States to respect

[9] "Do no harm" refers to measures taken to avoid exposing victims, witnesses, sources or communities to further risk. Findings are included in this briefing paper where they meet the "reasonable grounds to believe" standard: namely, where, based on a reliable body of verified information, an ordinarily prudent observer would have reasonable grounds to believe that the facts took place as described, and, where legal conclusions are drawn, that these facts have been assessed in light of the applicable normative framework.
[10] See supra n. 1.
[11] Ibid.
[12] See supra n. 1. See also CCPR, General Comment no. 31 (2004), para. 11.

and ensure the human rights of persons subject to their jurisdiction. The obligation to ensure rights includes the duty to protect individuals from harm caused by private persons or entities, including business enterprises. This requires States, inter alia, to exercise due diligence by taking appropriate legislative, administrative, judicial and other measures to prevent, investigate, punish and address reasonably foreseeable harm.[13] The Human Rights Committee has noted that this includes activities taking place in whole or in part within a State's territory or jurisdiction that have direct and reasonably foreseeable impacts on the right to life of individuals outside its territory.[14] The United Nations Guiding Principles on Business and Human Rights (UNGPs) further provide that States should set clear expectations for companies domiciled in their territory and/or jurisdiction to respect human rights throughout their operations.[15]

13. In addition, IHL contains obligations on States with respect to their relations with parties to armed conflicts. Most fundamentally, common article 1 to the 1949 Geneva Conventions imposes an obligation on all High Contracting Parties to respect and ensure respect for the Conventions in all circumstances. The obligation to ensure respect includes both negative and positive dimensions: States must not contribute to violations of IHL, and must take appropriate steps, within their capacity and influence, to promote compliance with IHL by parties to the conflict.[16]

14. Other areas of international law may also, depending on the circumstances, be applicable and govern the obligations of States when addressing aspects of the gum arabic trade, such as obligations of States under international treaties on corruption and transnational organized crime.[17]

3.3 Business enterprises

15. The UNGPs provide a central normative reference for preventing and addressing the risk of adverse impact on human rights involving business activity. They are structured around three pillars: the State duty to protect against business-related human rights abuse, addressed above; the corporate responsibility to respect human rights; and access to remedy.[18]

16. Under Pillar II of the UNGPs, business enterprises have a responsibility to respect internationally recognized human rights. This means they should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved. To know and show that they respect human rights, companies should undertake ongoing human rights due diligence to identify, prevent, mitigate and account for adverse human rights impacts linked to their operations, products or services, including through their business relationships and value chains.[19] Moreover, companies operating in or linked to conflict-affected areas are also expected to respect IHL.[20]

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[13] Human Rights Committee, General Comment No. 31, The Nature of the General Legal Obligation Imposed on States Parties to the Covenant, UN Doc. CCPR/C/21/Rev.1/Add.13, 26 May 2004, para. 8.
[14] Human Rights Committee, General Comment No. 36, Article 6: Right to Life, UN Doc. CCPR/C/GC/36, 3 September 2019, paras. 21-22.
[15] Report of the Special Representative of the Secretary-General on the issue of human rights and transnational corporations and other business enterprises, John Ruggie, Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, UN Doc. A/HRC/17/31, 21 March 2011, annex, Guiding Principle 2.
[16] Common Article 1 to the 1949 Geneva Conventions. See also ICRC, Commentary on the First Geneva Convention, 2016, paras. 119-120, 154-173 and 187-191; ICRC, Customary International Humanitarian Law, Rule 144.
[17] See, for example, United Nations Convention against Transnational Organized Crime, General Assembly resolution 55/25, November 2000; United Nations Convention against Corruption, General Assembly resolution 58/4, 31 October 2003.
[18] See supra n. 15, annex, General Principles.
[19] Ibid., UNGPs, Guiding Principles 11, 13(b), 15 and 17.
[20] Ibid., UNGPs, Guiding Principle 12 and commentary; see also Working Group on the issue of human rights and transnational corporations and other business enterprises, Business, human rights and conflict-affected regions: towards heightened action, UN Doc. A/75/212, 21 July 2020, paras. 9-10.

17. In conflict-affected contexts, where the risk of becoming involved in serious human rights abuses is greater, the UNGPs clarify that due diligence should be heightened, ongoing and conflict-sensitive.[21] This requires stronger conflict analysis, reinforced engagement with affected stakeholders, and continued monitoring of changing risk factors.[22] Heightened human rights due diligence applies equally when companies work through intermediaries or when their supply and value chains pass through conflict-affected areas.[23]

18. Where business enterprises identify that they have caused or contributed to adverse human rights impacts, they should provide for, or cooperate in, remediation through legitimate processes, including, where appropriate, effective operational-level grievance mechanisms.[24]

19. Depending on the context, companies and/or their personnel may face civil, administrative and/or criminal liability for conduct linked to serious human rights violations or abuses, or IHL violations, including for example through corruption, smuggling and document falsification. Individuals may also be held liable for crimes under international law, such as war crimes, including where they aid, abet or otherwise assist in the commission or attempted commission of the crime.

4. Sudan's war economy

4.1 Historical and structural context of Sudan's war economy

20. Sudan's current war economy is rooted in a longer-standing political economy in which, among other structural factors, military and security actors, including SAF-linked commercial entities and individuals affiliated with the armed forces, progressively gained influence in commercial sectors and, at times, crowding out or co-opting private enterprises.[25] From the 1970s and early 1980s, the military's economic role reportedly moved beyond core defense-related functions into commercially significant sectors, including infrastructure, transport, finance, construction, agriculture, industrial production and commercial trade.[26] During the National Congress Party rule from 1989 to 2019, the involvement of military, security and regime-linked actors in commercial sectors deepened through so-called "empowerment" policies under which such actors were reportedly placed in or given privileged access to State institutions, companies and commercial sectors, alongside expanding networks of security-linked firms active across many areas of the economy.[27] Alongside SAF-linked commercial networks, other security actors were reportedly empowered, notably National Intelligence and Security Service (now the General Intelligence Service), creating broader and, often, competing security-economic networks.[28]

21. The RSF's economic and political role reportedly expanded further in the later Al-Bashir period and during the post-2019 transitional period leading up to the outbreak of the conflict in April 2023, including reportedly

[21] UNGPs, Guiding Principle 17 and commentary; Working Group on Business and Human Rights report, supra n. 20, paras. 22 and 44; United Nations Development Programme, Heightened Human Rights Due Diligence for Business in Conflict-Affected Contexts: A Guide, 2022, pp. 8-10 and 19–20.
[22] Working Group on Business and Human Rights report, supra n. 20, paras. 44-48 and 52; United Nations Development Programme, Heightened Human Rights Due Diligence for Business in Conflict-Affected Contexts: A Guide, 2022, pp. 22-24 and 36-40.
[23] UNDP, *Heightened Human Rights Due Diligence Guide*, p. 24; see also Working Group on Business and Human Rights report, supra n. 20, para. 41.
[24] UNGPs, Guiding Principles 22, 25 and 29-31.
[25] Bienen, H. and Moore, J. (1987). 'The Sudan: Military Economic Corporations', Armed Forces & Society, 13 (4), pp. 489-516.
[26] Ibid.
[27] Ahmed Soliman and Suliman Baldo, Gold and the War in Sudan, Chatham House, March 2025, section 2.
[28] "…the military and security apparatus has shares in, or owns, companies involved in the production and export of gold, oil, gum arabic, sesame, and weapons; the import of fuel, wheat, and cars; telecommunications; banking; water distribution; contracting; construction; real estate development; aviation; trucking; limousine services; and the management of tourist parks and events venues." Jean-Baptiste Gallopin, *Bad company: How dark money threatens Sudan's transition*, European Council on Foreign Relations (ECFR), Policy Brief ECFR/324**,** June 2020, pp. 22.

through access to gold-linked revenues and related external linkages, and reinvestment into sectors such as agriculture, information communication technologies and banking.[29]

22. These largely autonomous military and security-linked commercial entities have enabled military and security actors to retain revenue streams with limited civilian oversight and outside full state fiscal control, compromising effective fiscal management.[30]

23. Following the 2019 revolution and the August 2019 power-sharing agreement, civilian-led reform efforts through the transitional authorities intended to dismantle these structures and recover assets, but progress was limited by severe macroeconomic fragility, and political constraints including through resistance from military and security-linked commercial entities.[31]

4.2 Wartime economic control and territorial revenue systems

24. The outbreak of hostilities between the RSF and the SAF in April 2023 has exposed and further reinforced pre-existing patterns of weak economic governance and security-linked control over markets, trade and key economic activities. Control over trade routes, border access and key market nodes has become increasingly strategic for both parties to the conflict and their associated economic networks and institutions. Territorial control over these routes and nodes has thus become a core mechanism through which parties and affiliated actors shape Sudan's war economy and economic geography.[32]

25. As the conflict has continued, the costs of sustaining military operations have risen, which has reportedly led both parties to rely increasingly on territorial and corridor control to benefit from the resources located in areas under their control and from the movement of goods along those corridors.[33] For example, in RSF-controlled areas, OHCHR observed that patterns of informal checkpoints and "fees", as well as trade convoys organized or protected by RSF-affiliated actors, have emerged, alongside increased cross-border smuggling and repeated incidents of looting of commercial and humanitarian cargo.[34] At the same time, traders operating in SAF-controlled areas report increased formal and informal charges, alongside checkpoints and charges administered by national authorities and allied security forces.[35]

26. Across Sudan, companies, traders and transporters have adapted to these evolving circumstances by rerouting movements, consolidating shipments, negotiating passage with armed actors on the ground and factoring informal payments, delays and confiscation risks into their pricing and business models.[36] These wartime shifts have also contributed to a reordering of Sudan's economic geography, with corridors running through RSF-held parts of Darfur and Kordofan becoming particularly exposed to informal taxation, insecurity and cross-border smuggling, while northern and eastern routes towards Port Sudan and Northern State, though relatively more secure and more tightly regulated, have also been affected by dense checkpoints, formal and informal charges and, to a lesser extent, reported cross-border smuggling.[37]

[29] Ibid., pp. 20–25.
[30] Ibid.
[31] On the transitional reform agenda and its constraints, see IMF, Sudan: 2019 Article IV Consultation (Country Report No. 20/72), (pp. 1-4). See also World Bank, Sudan Reengagement and Reform Development Policy Financing, p. 22. See also Gallopin, supra n. 28, pp. 20-25.
[32] Remote interviews with economic researchers and experts, September-October 2025; H. Abushama et al., Political and Economic Drivers of Sudan's Armed Conflict, IFPRI Sudan Strategy Support Program Working Paper 15 (2023), pp. 15–16.
[33] Ibid, pp. 3–4 and 27–28.
[34] Multiple remote interviews with economic researchers, experts, and local traders September-December 2025.
[35] Ibid.
[36] Remote interview with economic researcher, September 2025.
[37] Remote interviews with multiple sources, September-December 2025.

4.3 Commodity sectors and conflict financing

4.3.1 Gold

27. Within Sudan's current war economy, gold plays a central role and is considered the most financially significant commodity in export terms and a major revenue source for both parties to the conflict. While this briefing paper focuses on gum arabic as an illustrative case of how a globally relied upon commodity can become exposed to conflict-related adverse human rights impacts across its value chain, gold should be considered in any comprehensive analysis of Sudan's conflict-linked commodity chains.

28. Official data from the Central Bank of Sudan and the Sudanese Mineral Resources Company indicate that in 2024, declared gold production in SAF-controlled areas was about 65 tons, of which about 28 tons were officially exported via Port Sudan, with a reported value of around $1.6 billion, accounting for roughly 48.5 per cent of Sudan's total exports.[38] In 2025, the Sudanese Mineral Resources Company stated that Sudan's gold production reached 70 tons.[39]

29. However, a significant gap remains between reported production and officially recorded exports. Reports and official statements indicate that nearly 48 per cent of Sudan's 2024 gold output was smuggled out of the country, with only 52 per cent entering formal export channels.[40]

30. In RSF-controlled areas, while there is no official production data, reports indicate that RSF-linked economic networks continue to extract and trade gold from mining areas in Darfur and Kordofan, including Jebel Amer in North Darfur, Songo in South Darfur, and Talodi in South Kordofan.[41] Furthermore, reports indicate that, early in the conflict, the RSF seized the Sudan Gold Refinery in Khartoum and captured an estimated 1.3 tons of unrefined gold ready for export.[42]

4.3.2 Agricultural and livestock trade

31. Beyond gold and extractive sectors, Sudan's agricultural economy, which prior to the conflict employed about half of the population and provided a major part of export earnings, has been significantly disrupted by large-scale displacement, violence, and insecurity along trade routes.[43] Key production and agricultural areas in Al Jazirah, Blue Nile, Darfur, Kordofan and Sennar have seen massive declines in cultivated areas and output since April 2023, due to population movements, attacks and looting of irrigation and storage infrastructure, shortages of fuel and other inputs, and sharply increasing transport costs.[44] Similarly, livestock trade, another major export sector, has been heavily affected by the conflict, with traders increasingly facing dense

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[38] See Soliman and Baldo, supra n. 27, pp. 11–13 and fig. 2 (referencing the Sudanese Mineral Resources Company, SMRC 2024 Achievements, and Central Bank of Sudan, Foreign Trade Statistical Digest 2024).
[39] Sudanese Mineral Resources Company (SMRC), Facebook post, official page, stating that Sudan's gold production reached 70 tons in 2025: https://www.facebook.com/share/p/1N5vwj9j8L/?mibextid=wwXIfr, date 28 December 2025.
[40] See Media conference with Mohammed Taher Omar, Director-General of the Sudanese Mineral Resources Company (SMRC) https://www.aljazeera.net/ebusiness/2025/7/17/sudan-gold-first-half dated 17 July 2025; see also Soliman and Baldo, supra n. 27 pp. 20 "…in reality it is estimated that unofficial and smuggled gold exports to Egypt [between 2023 and 2024] account for about 60 per cent of the production from Northern, River Nile and Red Sea states, areas that have shared borders with Egypt". For 2025, OHCHR could not identify comparable publicly available estimates of the proportion of gold that entered official export channels or was smuggled out of the country.
[41] Soliman and Baldo, supra n. 27, pp. 11, 20–22, 24.
[42] Ibid., pp. 16.
[43] Special Report 2023: FAO Crop and Food Supply Assessment Mission (CFSAM) to the Sudan, 19 March 2024 https://reliefweb.int/report/sudan/special-report-2023-fao-crop-and-food-supply-assessment-mission-cfsam-sudan-19-march-2024-enar.
[44] See H. Abushama et al., supra n. 32, pp. 16–17. Also, FAO reported that Sudan's production of cereals, including sorghum, millet and wheat, was estimated at about 4.1 million tonnes in 2023, down 46 per cent from 2022 output and about 40 per cent below the average of the previous five years; see FAO, 2023 CFSAM to the Republic of the Sudan, supra n. 43. For 2025, FAO estimated Sudan's cereal production at approximately 5.2 million tonnes, representing a 22 per cent decline compared with 2024 and 19 per cent below the five-year average; see FAO, Special report: 2025 FAO CFSAM to the Republic of the Sudan, March 2026.

checkpoint systems, formal and informal charges, extortion, and, in some areas, attacks and looting by parties to the conflict and affiliated actors affecting major livestock markets.[45]

32. Within Sudan's agricultural and natural resource economy, gum arabic holds a structurally unique position. While it accounts for a relatively small share of Sudan's total export value, Sudan was, before April 2023, the dominant global supplier of the commodity. Since the outbreak of the conflict in April 2023, insecurity, displacement, re-routing of trade and incidents of looting have disrupted official gum arabic exports, while informal trade, new trading hubs and re-exports through neighbouring States have persisted and expanded, creating new smuggling routes and greater ambiguity over where, and under which conditions, Sudanese gum arabic is sourced.

33. These factors make gum arabic an illustrative case for understanding the implications of wartime value chain restructuring for human rights and the related responsibilities of States and business enterprises. The following sections map human rights risks and adverse impacts arising along the gum arabic value chain.

5. Mapping human rights risks in Sudan's gum arabic value chain

5.1 Gum arabic sector in Sudan: production, economic significance and pre-conflict structure

34. Gum arabic, also known as acacia gum, is a dried, water-soluble plant exudate obtained from the stems and branches of *Acacia senegal (L.) Willdenow* or *Acacia seyal (fam. Leguminosae)*.[46] Its importance lies in its functionality as a plant-based hydrocolloid that acts as an emulsifier, stabilizer and thickener; it readily dissolves in water and effectively stabilizes oil-in-water emulsions.[47] These properties make gum arabic a small but critical input in major value chains such as confectionery and beverages, including soft drinks. Moreover, gum arabic is widely used in the pharmaceutical and cosmetic industries.[48]

35. In Sudan, the two commercially important categories of gum arabic are commonly known as *hashab* (hard gum from *A. senegal*) and *talha* (friable gum from *A. seyal*).[49] Prior to the conflict, production was concentrated across the so-called "gum belt", including the Kordofan and Darfur regions, as well as Blue Nile, White Nile, Sennar and Gedaref States, where smallholders and semi-nomadic farmers relied on gum arabic harvesting as an important off-season source of income.[50]

36. Before April 2023, gum arabic was one of Sudan's main export commodities and a key foreign-exchange earner, generating an estimated USD 111–183 million in annual export earnings.[51] An estimated 5 million people in Sudan benefitted directly or indirectly from the gum arabic sector.

37. The value chain typically ran from smallholders and local rural markets to intermediary collection points and semi-urban markets, and then to urban warehouses and exporters, with exports typically moving through Port Sudan and ultimately reaching international processors. Further information received indicates that there were approximately 40 to 46 exporters, of which only 6 to 10 firms accounted for most exports.[52]

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[45] H. Abushama et al., supra n. 32, pp. 18, 19, 23. Also, OHCHR has documented several attacks affecting markets, including livestock markets, particularly in North Darfur, resulting in civilian casualties and the destruction of goods and market infrastructure; see supra n. 1.
[46] FAO/WHO Joint Expert Committee on Food Additives (JECFA), Gum Arabic (Monograph; prepared at the 51st JECFA, 1998; republished 1999), p. 1.
[47] Ibid., and UNCTAD, Commodities at a Glance: Special issue on gum arabic (2018), p. 16.
[48] UNCTAD, supra n. 47, Chapter 2, Uses, pp. 8–11.
[49] Remote interviews with multiple gum arabic value-chain and economic experts, September-December 2025; Moammar Dayoub, "Trends and Challenges in Gum Arabic Markets in Key Producing Countries in Africa (Sudan, Chad, Nigeria, and Senegal)," Commodities, vol. 4 (2025), article 16, p. 7.
[50] Ibid.
[51] PAX, How trade in gum arabic fuels conflict in Sudan. Utrecht: PAX (2025), p.5. See also Moammar Dayoub, supra n. 49, p. 3, stating that "[i]n Sudan, gum arabic is an economic and ecological backbone".
[52] Remote interview with economic and gum arabic expert, September 2025.

38. OHCHR received information suggesting that some firms with significant market power were linked to the security sector. According to information received from a local producer in South Kordofan, prior to the conflict, a company reportedly linked to the security apparatus operated through local intermediaries who provided limited financing to farmers and producers for tapping, collection and cleaning, and then purchased most of the output. By the end of the harvest season, a large share of the gum arabic could reportedly become concentrated in the hands of a single company, which in turn was able to set prices, thereby limiting producers' bargaining power and exposing them to exploitative arrangements.[53]

39. This market concentration had historical roots. The state-linked Gum Arabic Company exercised a monopoly over exports for decades. Although that monopoly formally ended in 2009, exports remained concentrated among a relatively small number of Sudanese exporters and international processors.[54]

40. Despite longstanding issues of opacity, unequal value distribution and market concentration, information received by OHCHR indicates that, prior to the conflict, gum arabic moving through formal export channels generally passed through licensed exporters and customs and export procedures, supported by related trade documentation and verification processes. These mechanisms provided a degree of origin verification and traceability for the gum arabic, without resolving broader concerns regarding producer bargaining power and market concentration.[55]

5.2 Impact of the conflict on the gum arabic value chain and associated human rights risks

41. OHCHR received information that, in the early months of the conflict, while some production areas were not immediately affected, a series of incidents disrupted significant stocks of gum arabic stored in Khartoum and that had been prepared for export. Information received indicates that warehouses in Soba, Safola and other parts of Khartoum were looted, burned or blocked in April 2023 by actors affiliated with the RSF, interrupting the movement of export-ready gum arabic and causing major economic losses to traders and exporters.[56]

42. OHCHR also received information that, following these incidents, from the early months of the conflict and increasingly during 2024, movement of gum arabic through areas controlled by the RSF, including around Khartoum and along routes from production areas, depended on informal arrangements, including personal relationships, bribes and later more structured payments. According to information received, in some cases this process was subsequently "formalized" by the RSF through fees and, at times, the use of armed escorts, allowing some stocks to continue moving under increasingly coercive and irregular conditions.[57]

43. OHCHR further received information that, beyond these RSF-imposed arrangements, the movement of gum arabic across conflict-affected routes has, since the outbreak of the conflict, been subject to layered formal and informal charges imposed by multiple actors, including in areas under the control of the SAF and along routes controlled by aligned armed groups and other local actors. Different accounts indicate that these cumulative costs reduced profit margins and were often effectively passed down the value chain through lower prices paid to producers, while also increasing incentives to divert gum arabic away from Sudan's formal export channels and move it through cross-border smuggling routes into neighboring States.[58]

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[53] Remote interview with gum arabic producer from South Kordofan, December 2025.
[54] Remote interviews with multiple sources, September-December 2025; see also PAX, supra n. 51, pp. 7-8.
[55] Remote interviews with multiple sources, September-December 2025.
[56] Remote interviews with multiple sources, September-December 2025.
[57] Accounts received by OHCHR indicate that such payments varied by route, period and shipment arrangements, with some interlocutors referring to amounts ranging from several hundred USD to around USD 2,000 per truck; see also Final report of the Panel of Experts on the Sudan established pursuant to Security Council resolution 1591 (2005), S/2025/239, 17 April 2025, https://docs.un.org/en/s/2025/239, para. 88 (recording RSF-imposed fees of SDG 1 million per 20-ton truck, plus zakat, on routes heading to South Sudan).
[58] Information received by OHCHR indicates that, depending on the route, the season and the security situation, traders and transporters were reported to face approximately 20 to 40 checkpoints. One account estimated that transport and checkpoint related costs may absorb as much as 60 per cent of shipment value, with the burden ultimately shifted onto producers through lower prices. OHCHR also received information from a gum arabic producer that, in areas under the control of the SAF, traders faced, or could face, not only informal charges but also multiple layers of formal payments, including state-level taxes, Ministry

44. OHCHR received further information that, in October 2024, the RSF issued measures tightening their control over the movement of goods from areas under their control and increasingly restricting the movement of goods, including gum arabic, toward SAF-controlled areas. This increased pressure on traders to reroute goods through alternative cross-border smuggling routes, most prominently through cross-border routes into South Sudan and Chad.[59]

45. As the conflict continued to expand through 2024 and 2025, deepening Sudan's territorial fragmentation, the gum arabic value chain became increasingly split across different areas of control. Information received indicates that gum arabic produced in areas controlled by the SAF, including parts of South Kordofan and Blue Nile, continued in some cases to move toward Kosti (White Nile) and ultimately Port Sudan (Red Sea) for export, while significant quantities from areas controlled by the RSF in West Kordofan and parts of Darfur were redirected toward Souq al-Na'am, South Sudan, Juba and onward to Mombasa port in Kenya.[60] Other alternative routes also reportedly emerged, including toward Chad and, in some cases, onward to Douala Port in Cameroon and other cross-border outlets. Further information received indicates that new internal and external hubs emerged as part of this conflict-related restructuring of the value chain, further weakening traceability and oversight.[61]

46. A report by the United Nations Panel of Experts on the Sudan established pursuant to Security Council Resolution 1591 (2005) confirms this pattern. In particular, the report documented the onward transport of looted gum arabic through routes leading to Chad, the Central African Republic and South Sudan.[62] The Panel also found that widespread looting of gum arabic by the RSF was used as a form of compensation for fighters in the absence of salaries, and that at least 3,700 tons were looted between January and June 2024, which indicates that parts of the gum arabic value chain were used to directly sustain RSF operations.

47. As fighting and territorial contestation expanded into major production and trading centres in the gum arabic belt through 2024 and 2025, OHCHR received information about a major looting incident and related violence in El-Nuhud, West Kordofan, one of the most important gum arabic trade centres in Sudan. Information received indicates that the Gum Arabic Exchange and its warehouses, as well as parts of the wider market, were looted by the RSF in early May 2025, at a time when stocks were reportedly full and ready for export. Accounts documented by OHCHR describe large-scale looting and severe disruption to local trade and livelihoods, as well as reports of killings of people attempting to defend their property.[63] One local account further stated that more than 540 trucks loaded with gum arabic were ready for export from El-Nuhud, each reportedly carrying roughly 30 tons. Accounts received by OHCHR further indicated that part of the looted stocks was moved westward toward Darfur and Chad.

48. OHCHR also reviewed open-source social media postings published after the El-Nuhud incident that advertised large quantities of gum arabic for sale within Sudan and through neighbouring country linked routes, including in South Sudan and Kenya-linked export channels. Some postings referred to large quantities, availability in neighbouring countries or through routes linked to neighbouring export channels, or gum

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of Finance fees, forestry fees, zakat, inter-state transit fees, federal taxes and export fees, which in some cases eliminate traders' profit margins.

[59] Information received by OHCHR also indicated the use of alternative smuggling routes toward Libya, the Central African Republic and Egypt. However, the information reviewed suggests that routes through South Sudan and Chad were among the most prominent channels used following the October 2024 restrictions.

[60] One producer informed OHCHR that traders increasingly regarded the South Sudan route as more profitable, indicating that the price per ton was about USD 2,800 in South Sudan compared with about USD 1,800 inside Sudan. The same account described the route as moving through Souq al-Na'am to Juba, South Sudan, and then onward to Mombasa port in Kenya.

[61] Remote interviews with multiple sources, September-December 2025.

[62] Supra n. 57, paras. 84, 86 and 87. The Panel of Experts reported that around 3,700 tons of gum arabic, with an average value of USD 14,578,000, were looted between January and June 2024, and referred to onward movement via Adré in Chad, from Um Dukhun to Chad, from Songo via Umm Dafog to the Central African Republic, and from Ed Daein to Aweil in South Sudan.

[63] Remote interviews with multiple sources, September-December 2025.

offered without papers or documentation.[64] While such material does not, on its own, prove the origin of the goods advertised, it remains consistent with broader information documented by OHCHR regarding weakened traceability following major looting incidents and the circulation of undocumented gum arabic within Sudan and through cross-border smuggling routes into neighboring countries.

49. OHCHR further received information that, by August 2025, the movement of gum arabic toward Chad through areas controlled by the RSF was subject to tighter direct restriction and control. In one account, a truck driver stated that, in August 2025, he transported 25 tons of gum arabic from El Daein, East Darfur, toward Chad after obtaining the required documents from RSF-related "authorities", but was stopped by RSF intelligence personnel in Zalingei, Central Darfur. He reported being detained for a week and forced to unload the shipment after being informed that a "decree" had been issued by the RSF halting the movement of gum arabic. According to the same account, RSF intelligence personnel also confiscated gum arabic from other trucks passing through the area, although the destination or subsequent use of the confiscated stocks remained unclear.

50. The risks associated with Sudan's gum arabic value chain are not limited to documentation, traceability and cross-border smuggling of goods. They also include adverse impacts on the enjoyment of human rights by producers, workers, traders and transporters involved in the value chain. As discussed above, these individuals have been affected by conflict-related impacts, including displacement, increased reliance on informal and irregular trade arrangements, looting, heightened insecurity, threats to physical safety and, in some cases, arbitrary or otherwise undue arrest or detention. While not all these impacts are specific to the gum arabic value chain, they continue to affect the rights of people participating in, or dependent on, the sector. They have adversely affected livelihoods and working conditions of those in the sector, including the rights to an adequate standard of living and to just and favourable conditions of work, while deepening existing patterns of unequal value distribution for already vulnerable actors within the value chain.

51. Of particular concern, OHCHR received information regarding RSF-affiliated actors' involvement in the looting and theft of gum arabic stocks, restrictions on movement, and, in some cases, arbitrary detention or violence against persons protecting private civilian property. Such practices raise human rights concerns and, in some cases, could engage the obligations of the RSF under IHL, including the prohibition of pillage.

52. OHCHR further received information indicating that large parts of the gum arabic production belt, including in Darfur and Kordofan, have been significantly affected by the conflict. Displacement and fighting have limited access to production areas and further affected the harvesting and trade of gum arabic. In some areas, particularly in Darfur and Kordofan, gum forests are reportedly deteriorating and trees have reportedly been cut, including by people facing shortages of electricity and fuel and relying on wood for cooking and other basic needs. These conditions may have longer-term implications not only for the livelihoods of producers and rural communities, but also for the sustainability and recovery of the sector itself.[65]

6. State obligations in conflict-affected gum arabic sourcing

53. This section considers Sudan as the State of production and initial export; neighboring and transit States as those through which gum arabic may move or be re-exported; and home States of companies in the downstream gum arabic value chain. These States have distinct roles and obligations relevant to preventing, regulating and responding to actual or potential adverse human rights impacts identified in this paper.

[64] OHCHR reviewed public Facebook postings from the group "تصدير الصمغ العربي", dated, inter alia, 19 June, 30 June and 9 September 2025, advertising gum arabic in large quantities, including posts referring to availability in South Sudan, export from Mombasa, and gum offered without papers. OHCHR treats these materials as open-source indicators relevant to the broader pattern observed. See https://www.facebook.com/groups/1035800091135841/.

[65] Interviews with multiple sources, September-December 2025.

6.1 Sudan

54. Sudan is both the country of production and initial export, and the State where human rights violations and abuses, as well as possible IHL violations associated with Sudanese-sourced gum arabic, have taken place. Its obligations include the duty to respect IHRL and IHL, as well as the duty to protect persons within its jurisdiction from foreseeable harm by private persons or entities. Sudan must also take appropriate steps, within its capacity and influence, to ensure respect for IHL, including by seeking to induce compliance by relevant non-State actors. The State may also have responsibilities under other international instruments, including addressing corruption and transnational organized crime, including through criminal prosecution and international cooperation.

55. The ongoing conflict has severely constrained the Sudanese authorities' effective oversight and protection across the gum arabic value chain. Continued fighting, fragmentation of territorial control, and RSF control over large parts of the gum arabic belt, including major production areas, have limited the reach of public institutions and regulatory safeguards that would generally help identify, prevent and respond to risks in the sector. While these constraints affect the practical exercise of State authority, they do not remove Sudan's obligation to refrain from violating IHRL and IHL, and to take positive measures, within available means, to respect and ensure the rights of persons in affected areas, including in areas outside its effective control, and to address business-related negative human rights impacts in the sector.

56. Trade of gum arabic moving toward formal outlets, including routes linked to Port Sudan, has been affected not only by insecurity, but also by layers of formal and informal charges, including at checkpoints in areas under the control of the SAF and, in some cases, along routes controlled by SAF-aligned armed groups and local actors. At the same time, further information received suggests that some security-linked commercial actors have enjoyed preferential conditions not available to ordinary traders and producers.[66] These circumstances raise concerns regarding unequal treatment, weak regulatory control and oversight, and the extent to which such conditions have contributed to unequal value distribution and exposed some traders and producers to exploitative and unequal arrangements.

57. OHCHR also received information indicating that the documentation and traceability mechanisms previously part of the formal gum arabic trade have been significantly weakened during the conflict. Exporter licenses and other documentation that once provided a degree of control over formal trade appear increasingly vulnerable to misuse, including in cases where looted gum arabic is reintroduced into formal channels for export under altered classifications. In particular, information received suggests that gum arabic may be re-sold at low prices, including as so-called "broken gum", and then purchased by licensed exporters, allowing it in some cases to be exported under existing documentation.[67] These reported practices highlight a conflict-related gap in regulatory oversight and increase the risk that conflict-affected gum may circulate through formal channels without effective scrutiny.

6.2 Neighbouring and transit States

58. Information received by OHCHR also raises concerns regarding the role of neighbouring and transit States in the onward movement of Sudanese gum arabic. Accounts received relating to Chad and South Sudan indicate that gum arabic originating in conflict-affected areas of Sudan has crossed borders largely through smuggling channels and, in some cases, has subsequently entered customs systems and commercial export channels as if it were locally produced. Information received further suggests that, because both Chad and South Sudan are themselves gum arabic producing countries, Sudanese gum can in some cases be treated, documented, or traded as a national product of those States once it enters local commercial or export

[66] One producer informed OHCHR that traders linked to security companies or armed actors were, in some cases, reportedly able to move large quantities of gum arabic without bearing the full range of taxes, fees and other charges applicable to others, including informal charges along routes and checkpoints in areas under the control of the SAF.
[67] Interview with a local trader and a journalist specializing in monitoring the gum arabic value chain, September-December 2025.

channels.[68] This may indicate weaknesses in border control, customs scrutiny and/or origin verification, and creates conditions in which the origin of conflict-affected gum arabic can become difficult to verify in onward trade.[69]

59. Trade trends following the outbreak of the conflict in Sudan provide additional indicators of possible diversion, including shifts in production and export activity in some neighbouring and transit States. Information reviewed by OHCHR, including trade data and expert accounts, suggests that export volumes in certain States increased significantly following the outbreak of the conflict in Sudan in ways consistent with the cross-border movement and re-labelling of Sudanese gum arabic.[70] While such indicators are not conclusive on their own, they suggest gaps in documentation and oversight that increase the risk that conflict-affected gum arabic is being absorbed into neighbouring export systems without proper scrutiny.

60. These patterns may be relevant to inform appropriate action by such States, including to prevent conduct by private actors that have direct and reasonably foreseeable impacts on the enjoyment of human rights in Sudan, or in circumstances where they contribute to violations of IHL by parties to the conflict in Sudan. They may also be relevant to inform required measures, including pursuant to international instruments in the areas of corruption and transnational organized crime, including where the practices are facilitated by organized smuggling, corruption, document manipulation and false or misleading origin claims, or breaches of customs rules.

6.3 Home States of downstream companies

61. Home States of companies in the downstream gum arabic value chain also have an important role in addressing and mitigating actual and potential adverse human rights impacts linked to conflict-affected sourcing. States should set clear expectations for companies domiciled or operating within their territory or jurisdiction to respect human rights throughout their operations and value chains, including through heightened human rights due diligence where sourcing is linked to conflict-affected contexts.[71]

62. This role is relevant in the case of gum arabic from Sudan, as information received by OHCHR indicates that downstream sourcing by international processors, buyers and companies whose products rely on gum arabic as an ingredient appears to have continued through value chains affected by human rights concerns, notably caused or worsened by looting, route disruption, weak traceability and possible relabelling through neighbouring States. In such circumstances, home States can use policy and regulatory measures, including due diligence requirements, to support responsible business conduct in the gum arabic value chain, while ensuring access to judicial and non-judicial remedy mechanisms in circumstances where businesses cause or contribute to adverse human rights impacts.[72]

[68] Multiple remote interviews with traders and monitors based in Chad, South Sudan and Kenya, September-December 2025.
[69] Accounts received by OHCHR indicate that gum moving through South Sudan may pass from Souq al-Na'am to Juba and onward to Mombasa port in Kenya, while gum entering Chad may pass through Adré customs and then move to Abéché and N'Djamena for onward export, including via Douala port in Cameroon.
[70] See, for example, PAX, supra n. 51, p. 14, reporting that imports from Sudan to the EU and the UK fell from 66,700 tons in 2022 to 49,900 tons in 2024, while imports from neighbouring countries rose from 12,200 tons in 2023 to about 19,700 tons in 2024.
[71] UNGPs, Guiding Principles 1, 2 and 7; Committee on Economic, Social and Cultural Rights, General Comment No. 24, State obligations under the International Covenant on Economic, Social and Cultural Rights in the context of business activities, UN Doc. E/C.12/GC/24, 10 August 2017, paras. 25–33; see also Working Group on Business and Human Rights report, supra n. 20, paras. 22 and 44.
[72] UNGPs, Guiding Principles 22 and 25.

7. Corporate responsibility to respect human rights in conflict-affected value chains

7.1 Heightened human rights due diligence

63. Under the UNGPs, business enterprises have a responsibility to respect human rights. In conflict-affected contexts, where the risk of causing, contributing to, or being directly linked to human rights abuses is heightened, business enterprises are expected to undertake heightened human rights due diligence to identify, prevent, mitigate and account for adverse human rights impacts linked to their operations, business relationships and value chains.[73]

64. In assessing how some actors involved in the gum arabic value chain publicly describe their approach to sourcing from Sudan during the conflict, OHCHR reviewed statements issued by one of the sector's main international industry associations. In particular, the Association for the International Promotion of Gums (AIPG) has issued six public statements since the outbreak of the conflict, in which it emphasizes continued supply, condemns smuggling, refers to supplier verification processes, and continues to regard the traceability and legitimacy of exports as ensured through traditional export channels and secure corridors. These statements also emphasized the importance of the sector for millions of Sudanese livelihoods, as well as the continued security of supply for international markets.[74]

65. The risks identified in this briefing paper, including looting, coercive control over trade routes, weak traceability, possible relabelling through neighbouring countries, and possible involvement of armed or security-linked actors, require sustained and detailed assessment. The public statements and materials reviewed by OHCHR, however, provide limited information on the extent to which, and how, the heightened risks linked to sourcing gum arabic from Sudan during the conflict are being assessed and addressed in practice.

66. Based on information reviewed by OHCHR, existing supplier verification measures and traceability claims appear unlikely, on their own, to be sufficient to capture the risks specific to conflict-affected sourcing in Sudan's gum arabic value chain. While AIPG refers to internal processes involving careful verification of suppliers' economic links and asserts that Sudanese partners have no connection with parties to the conflict, traceability remains extremely difficult to verify through such measures alone, particularly where gum arabic may be looted, moved across conflict lines, re-sold under altered classifications, or re-labelled through neighbouring States before reaching exporters and processors.[75]

67. In these circumstances, heightened human rights due diligence calls for a conflict-sensitive approach that goes beyond ordinary supplier verification and certification-related checks. Such an approach should include engagement with potentially affected groups and relevant stakeholders, as well as fuller assessment of route control, the role of intermediaries and export actors within Sudan and neighbouring countries, and the extent to which documentation of origin, verification and traceability systems have been compromised by conflict-related shifts, including reclassification, the reissuance of documentation in neighbouring producing countries, and unusual shifts in trade patterns.[76]

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[73] See para. 17.

[74] AIPG is an international association representing producers, processors and traders in natural tree exudate gums, principally gum acacia and other natural gums. OHCHR reviewed six AIPG public updates issued since the outbreak of the conflict, dated 28 April 2023, 12 June 2023, 7 March 2024, 4 June 2024, 27 January 2025 and 11 March 2025. See AIPG, "Who we are"; and AIPG, "Information on current supply situation of gum acacia."

[75] AIPG stated in its 4 June 2024 update that its members have "internal processes in place" involving "careful verification of the economic links of all their suppliers" and that its Sudanese members verify that Sudanese partners have no connection with parties to the conflict.

[76] UNGPs, Guiding Principles 17 and 18; Working Group on Business and Human Rights report, supra n. 20, paras. 44 and 46-48, 52; UNDP, Heightened Human Rights Due Diligence Guide, pp. 22-24 and 39-40.

7.2 Voluntary initiatives, disclosure and access to remedy

68. Information reviewed by OHCHR further indicates that some companies involved in the gum arabic value chain refer to voluntary initiatives such as Sedex, EcoVadis, Fair For Life, Global Compact, and TRAFFIC's We Use Wild.[77] While such initiatives may contribute towards responsible sourcing efforts, participation in or reference to them does not, on its own, show whether companies have conducted heightened and conflict-sensitive human rights due diligence that addresses the specific risks identified in Sudan's conflict-affected gum arabic value chain.

69. Furthermore, publicly available statements and materials issued by associations and companies engaged in Sudan's gum arabic value chain provide only limited public disclosure on how Sudan-specific conflict risks are being identified, assessed and addressed in practice.[78] This limited information hampers a comprehensive assessment of the sufficiency of existing due diligence processes.

70. Considering the human rights risks identified in this briefing paper, OHCHR notes that continued sourcing of gum arabic through the current value chain remains associated with a high-risk environment in which ordinary commercial assurances and existing verification measures, while important, appear largely insufficient. This is particularly relevant where sourcing has continued amid documented looting, fragmented or coercively controlled trade routes, and weak traceability.

71. The corporate responsibility to respect human rights does not require a binary approach between continued sourcing and immediate disengagement, particularly given the importance of gum arabic to the livelihoods of millions of Sudanese. It does, however, require heightened and conflict-sensitive human rights due diligence to inform appropriate action, including, among others, the use of leverage and adjustment of business relationships, with a focus on preventing and mitigating risks to affected people and supporting better human rights outcomes.[79]

72. According to the UNGPs, where business enterprises have caused or contributed to adverse human rights impacts, they should provide for or cooperate in remediation.[80] In conflict-affected sourcing contexts, such as the current gum arabic value chain in Sudan, grievance and response mechanisms for producers, workers, traders and transporters should be safe, accessible, predictable and conflict-sensitive. Such mechanisms should enable complaints and concerns to be received, reviewed and responded to in a timely and safe manner.[81]

8. Conclusion and recommendations

73. The conflict in Sudan, now well into its fourth year, has created a complex war economy in which control over commodities and trade routes has become closely linked to human rights violations and abuses, heightened human rights risks, and the material sustenance of parties to the conflict. In the context of Sudan, commercial activities connected to conflict-affected sectors, including natural resources and agricultural commodities risk contributing to, benefiting from, or otherwise being directly linked to exploitation and human rights violations, raising concerns for both States and companies connected to those sectors.

74. Gum arabic provides an illustrative case of how a conflict-affected value chain becomes exposed to heightened human rights risks. In Sudan, looting by armed actors, route fragmentation, informal taxation,

[77] See PAX, supra n. 51, pp. 15–17, on references by companies in the gum arabic sector to Sedex, the UN Global Compact, EcoVadis, Fair For Life, and TRAFFIC's We Use Wild initiative, as well as the report's discussion of the limits of such initiatives in the context of conflict-affected sourcing.
[78] See, for example, AIPG public updates, supra n. 74; see also PAX, supra n. 51, pp. 15-16.
[79] OHCHR, Business and Human Rights in Challenging Contexts: Considerations for Remaining and Exiting, August 2023, pp. 7-8 and 17, https://www.ohchr.org/sites/default/files/documents/issues/business/bhr-in-challenging-contexts.
[80] UNGPs, Guiding Principle 22.
[81] UNGPs, Guiding Principles 29-31; UNDP, Heightened Human Rights Due Diligence Guide, pp. 36-40.

smuggling and weak traceability have weakened formal channels and reduced oversight over the movement and trade of gum arabic, while adversely affecting the livelihoods, bargaining position and security of producers, workers and traders linked to the value chain.

75. The patterns identified in the gum arabic value chain point to significant weaknesses in oversight, regulation and response to conflict-affected sourcing at multiple levels. In Sudan, the conflict has undermined effective public oversight, while weak regulatory control, compromised documentation systems, and security-linked practices affecting the movement of goods have further increased human rights risks and adverse impacts within the value chain. In neighbouring and transit States, there is a risk that conflict-affected or unlawfully obtained gum arabic may move through cross-border smuggling routes and onward export channels without proper verification, facilitated by insufficient border control, customs scrutiny, weak origin verification and gaps in regulatory oversight. For home States of companies in the downstream gum arabic value chain, the human rights risks and adverse impacts associated with the gum arabic value chain indicate the need for clearer expectations, guidance and other measures to support heightened human rights due diligence for conflict-affected sourcing. Human rights concerns identified also entail the need for relevant States to assess and take remedial and preventive action, pursuant to their domestic legal frameworks and international obligations, including in the area of criminal law and international cooperation, to address organized smuggling, the falsification of documents, breaches of customs rules and false origin claims.

76. Sudan continues to account for a substantial share of the global gum arabic supply, despite the conflict and serious human rights risks identified in this paper. For the current sourcing measures and approaches to be able to address those risks, heightened attention to the respective obligations and responsibilities of States under international law and the responsibilities of companies to respect human rights, as reflected in the UNGPs, is required. States should take appropriate legal, regulatory and policy measures to address actual and potential adverse human rights impacts linked to conflict-affected sourcing, while companies are expected to respect human rights through heightened and conflict-sensitive human rights due diligence and ensure due attention to access to remedy for affected right holders throughout the value chain.[82]

The High Commissioner makes the following recommendations:

77. To the parties to the conflict:

- **(a) Respect IHL, including by refraining from acts of pillage, attacks directed against civilians or civilian objects, as well as any other acts of violence to life, health and physical or mental well-being of persons, or arbitrary deprivations of liberty;**
- **(b) Respect IHRL, including by refraining from practices adversely affecting enjoyment of rights by civilians involved in, or dependent on, the production, trade and transport of gum arabic, including threats to their physical safety, arbitrary or otherwise undue deprivation of liberty, restrictions on movement, looting or coercive practices affecting livelihoods, working conditions and access to an adequate standard of living.**

78. To the Sudanese authorities:

- **(a) Take all reasonable and appropriate measures to protect individuals within their jurisdiction from foreseeable harm, including human rights abuses by business enterprises in the gum arabic value chain;**
- **(b) Strengthen oversight and regulation of the gum arabic sector, in line with the UNGPs, in a manner that addresses both trade-related risks and adverse human rights impacts, including through scrutiny of exporter licences and trade documentation, and by effectively investigating alleged corruption, coercion or human rights-linked abuses affecting the value chain;**

[82] UNGPs, Guiding Principles 1, 2, 7, 11, 13, 17–19, 22, 25 and 29–31; OHCHR, Business and Human Rights in Challenging Contexts, supra n. 79; see also Working Group on Business and Human Rights report, supra n. 20, paras. 22 and 44.

(c) Take positive measures to promote the human rights of persons within Sudan's territory but currently outside effective control of the Sudanese authorities; and

(d) Ensure the right to effective remedies for victims of human rights violations and facilitate access to remedies for people affected by other business-related human rights violations and abuses linked to the gum arabic value chain.

79. To neighbouring and transit States:

(a) Strengthen border control, customs scrutiny, origin verification and documentation controls, and take measures to prevent smuggling, corruption, document manipulation, misleading origin claims or abuse of customs processes linked to Sudanese gum arabic;

(b) Develop and apply risk indicators such as sudden trade increases, unusual routing patterns, incomplete origin records or inconsistent classifications, to help identify cases requiring closer customs and origin-verification review; and

(c) Take appropriate measures to prevent persons, companies and entities under their jurisdiction from facilitating the movement, relabeling or re-export of looted or unlawfully obtained commodities from Sudan, including gum arabic, especially where there is a clear risk that such conduct may contribute to human rights violations or abuses, IHL violations, or otherwise materially contribute to sustaining the conflict.

80. To home States linked to downstream sourcing and processing:

(a) Take steps to ensure that relevant legal, regulatory and policy frameworks adequately capture conflict-related sourcing risks associated with the gum arabic value chain;

(b) Provide and promote clear guidance to companies sourcing through conflict-affected value chains on heightened human rights due diligence and related standards under the UNGPs;

(c) Take steps to ensure that business enterprises domiciled or operating within their territory or jurisdiction do not rely solely on ordinary supplier verification measures or voluntary initiatives where serious conflict-related risks are present;

(d) Use available policy, regulatory and enforcement tools to require, monitor, and promote, as applicable, conflict-sensitive due diligence by companies sourcing, processing or using gum arabic from Sudan or from neighbouring countries where there is a risk of relabelled Sudanese gum entering export channels; and

(e) Ensure that judicial, administrative and other appropriate remedy mechanisms are available and accessible to right holders affected by business-related adverse human rights impacts connected to conflict-affected sourcing.

81. To companies engaged in the gum arabic value chain, including exporters, processors, buyers and downstream companies:

(a) **Identify and avoid business relationships, payments, transport arrangements or sourcing practices that may contribute to, benefit from, or be directly linked to human rights violations or abuses or IHL violations;**

(b) **Undertake conflict-sensitive and heightened human rights due diligence that goes beyond ordinary supplier verification, in line with the UNGPs;**

(c) **Assess, on an ongoing basis, risks related to route control and movement conditions, intermediaries, documentation conditions, traceability gaps and possible relabelling through neighbouring States;**

(d) **Scrutinize sudden sourcing shifts, route changes or new export hubs, including where sourcing appears to move through other neighbouring routes in ways that weaken traceability;**

(e) **Provide public reporting that shows how conflict-related sourcing risks are being identified, assessed and addressed by them; and**

(f) **Engage, to the full extent possible, with upstream producers, workers, traders, transporters and other potentially affected groups and relevant stakeholders within their value chain and take available measures towards ensuring that appropriate and conflict-sensitive grievance and response mechanisms are in place for those affected.**