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CURBING THE ILLEGAL EXPLOITATION OF MINERALS IN THE GREAT LAKES REGION

Evaluation and Recommendations for the Implementation of the Regional Initiative against the Illegal
Exploitation of Natural Resources (RINR) in the ICGLR Member States

A large yellow mining truck, likely a Caterpillar 980G, is shown in a dark, industrial setting. The truck is positioned diagonally across the frame, with its front end towards the bottom left. The background is a dark, cloudy sky, and the ground appears to be a dirt or gravel surface. The overall tone is somber and industrial.

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Imprint

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Contents

EXECUTIVE SUMMARY

SECTION 1 - BACKGROUND AND METHODOLOGY

SECTION 2 - DEEP DIVE PER MEMBER STATE

SECTION 3 - DEEP DIVE PER TOOL

SECTION 4 - REVIEWING THE LAST DECADES' PROGRESS

SECTION 5 - GUIDELINES AND RECOMMENDATIONS

SECTION 6 - CONCLUDING REMARKS

Annexes

- **Annex A:** Recommendations Not Retained (For Further Discussion or Rejected)
- **Annex B:** Theory of Change and Metrics
- **Annex C:** Identified Enablers and Obstacles per tool
- **Annex D:** References and Bibliography

Abbreviations and acronyms

ASGM	Artisanal and Small-Scale Gold Mining
ASM	Artisanal and Small-Scale Mining

BECDOR	<i>Bureau d'évaluation et de contrôle de diamant et d'or</i>
BGR	Federal Institute for Geosciences and Natural Resources (Germany)
CEEC	<i>Centre d'Expertise, d'Évaluation et de Certification des substances minérales précieuses et semi-précieuse</i> (DRC)
CLS	<i>Comité Local de Suivi</i> (DRC Local Follow-Up Committee)
EITI	Extractive Industries Transparency Initiative
EU	European Union
GIZ	<i>Deutsche Gesellschaft für Internationale Zusammenarbeit</i> (German Development Cooperation)
ICGLR	International Conference on the Great Lakes Region
MOSES	Mineral Output Statistical Evaluation System
OECD	Organisation for Economic Co-operation and Development
POTS	Part of the Solution (project implementer)
RCM	Regional Certification Mechanism
RDMF	Regional Database on Mineral Flows
RINR	Regional Initiative against the Illegal Exploitation of Natural Resources
SAEMAPE	<i>Service d'Assistance et d'Encadrement de l'Exploitation Minière Artisanale et à Petite Échelle</i>
TOC	Theory of Change
TOR	Terms of Reference
WBM	Whistleblowing Mechanism
3TG	Tin, Tantalum, Tungsten, Gold

Country Names and Abbreviations

Country names and abbreviations used throughout this report reflect commonly used references. These correspond to the following official country names: **Angola** = Republic of Angola; **Burundi** = Republic of Burundi; **Central African Republic (CAR)** = Central African Republic; **Congo** = Republic of the Congo; **Democratic Republic of the Congo (DRC)** = Democratic Republic of the Congo; **Kenya** = Republic of Kenya; **Rwanda** = Republic of Rwanda; **South Sudan** = Republic of South Sudan; **Sudan** = Republic of the Sudan; **Tanzania** = United Republic of Tanzania; **Uganda** = Republic of Uganda; **Zambia** = Republic of Zambia.

List of Tables

Table 1: Introduction to the six RINR tools.....	12
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Table 2: Tool Overview Angola.....	21
Table 3: Tool Overview Burundi.....	23
Table 4: Tool Overview Central African Republic.....	26
Table 5: Tool Overview Republic of Congo.....	29
Table 6: Tool Overview DRC.....	32
Table 7: Tool Overview Kenya.....	35
Table 8: Tool Overview Rwanda.....	38
Table 9: Tool Overview South Sudan.....	40
Table 10: Tool Overview Sudan.....	42
Table 11: Tool Overview Tanzania.....	45
Table 12: Tool Overview Uganda.....	48
Table 13: Tool Overview Zambia.....	51
Table 13: Tool 1 - Status per country.....	55
Table 14: Tool 2 - Status per country.....	59
Table 15: Tool 3 - Status per country.....	62
Table 16: Tool 4 - Status per country.....	66
Table 17: Tool 5 - Status per country.....	69
Table 18: Summary of Section 4 on reviewing progress during the last 15 years.....	78
Table 19: Key Recommendations for the RINR.....	81
Table 20: Key Recommendations for Tool 1.....	82
Table 21: Key Recommendations for Tool 2.....	82
Table 22: Key Recommendations for Tool 3.....	82
Table 23: Key Recommendations for Tool 4.....	83
Table 24: Key Recommendations for Tool 5.....	83
Table 25: Key Recommendations for Tool 6.....	83
Table 26: Key Recommendations for RINRscope.....	84

SECTION 1

BACKGROUND AND METHODOLOGY

This section sets the context for evaluating the implementation progress of the Regional Initiative against the Illegal Exploitation of Natural Resources (RINR). It provides background on the mineral governance challenges in the Great Lakes Region, outlines the strategic objectives of the ICGLR, and describes the research methodology, including data collection methods, analytical frameworks, and key considerations shaping the study.



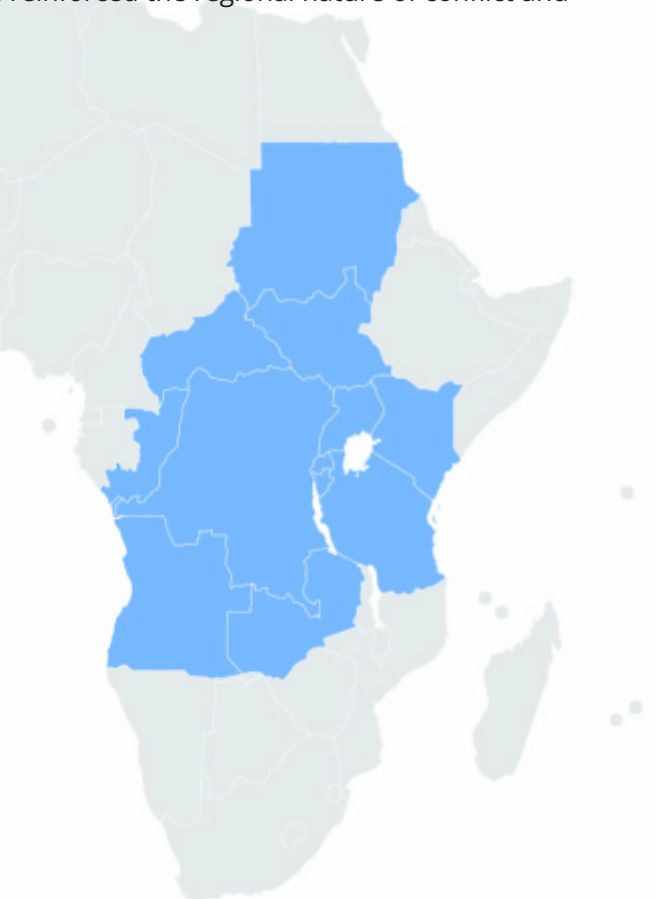
Introduction

1.1 The regional resource-conflict nexus

Natural resources have long stood at the center of political, economic, and security dynamics in the African Great Lakes Region (GLR). While minerals such as tin, tantalum, tungsten, and gold (3TG) underpin the livelihoods of millions and offer vast economic potential, their extraction and trade have also contributed to instability, conflict, and weak governance. A significant part of the region's mineral wealth is mined in artisanal and small-scale mining (ASM) operations which constitute a vital economic activity. However, ASM operations often operate in informal or illegal contexts, marked by poor enforcement of rules and regulations, exploitative labour conditions, environmental degradation, and vulnerability to criminal and armed group infiltration. The resource-rich landscape of the region has thus become entangled with cycles of violence, fragility, and underdevelopment.

Due to the region's geography and mineral endowments, trade in natural resources especially minerals has always had a transboundary character. Borders in the GLR are porous and often poorly controlled, while economic interdependence and migratory flows have created complex cross-border linkages. This has facilitated not only illicit trade but also smuggling and trafficking of minerals, often financing armed groups and criminal networks. Furthermore, conflicts in the GLR have historically spilled across borders: armed groups operate transnationally, and insecurity in one state frequently has repercussions in its neighbours. These dynamics have reinforced the regional nature of conflict and highlighted the limitations of purely national responses.

It was in the aftermath of the so-called Congo Wars (1996 - 2003) a period marked by overlapping national and regional conflicts that the realisation emerged among regional actors and the international community that the regional interconnectedness of the challenges requires collective solutions. Against this background, the creation of a regional diplomatic framework was considered. It was considered not only to coordinate concrete efforts across borders but also to build trust, political consensus, share standards, and create structures for mutual accountability. The need for a unified approach to tackle regional conflict underpinned the creation of the ICGLR in 2006. From the outset, the ICGLR was established not merely as a peacebuilding mechanism, but as a comprehensive framework to address the root causes of regional fragility – including weak governance, economic exclusion, displacement, and marginalization – all of which are deeply intertwined with the governance of natural resources. Ultimately, the ICGLR's mandate spans peace, security, governance, and development, reflecting the multidimensional nature of the region's challenges.



1.2 The RINR as a regional response

In 2010, the ICGLR launched the **Regional Initiative against the Illegal Exploitation of Natural Resources (RINR)** as a direct response to the role of mineral resources in sustaining armed conflict and undermining state authority in the region. Framed within the ICGLR Pact on Security, Stability and Development, the RINR was conceived as a regional peace and governance instrument aimed at disrupting the financing of violent conflict by non-state armed groups through mineral exploitation and trade, enhancing state oversight over the mineral sector, and improving coordination among Member States.

The formal political foundation of the RINR was established through the **Lusaka Declaration** of the ICGLR Heads of State and Government, adopted during a Special Summit in December 2010. This Declaration reaffirmed the region's collective commitment to addressing the illegal exploitation of natural resources as a central driver of conflict, and formally endorsed the RINR and its six tools.

The Lusaka Declaration outlined key objectives that continue to guide the RINR today:

- To eliminate the financing of armed groups through mineral exploitation;
- To promote transparent and responsible sourcing practices;
- To strengthen regional cooperation and information sharing;
- To harmonise national legal and policy frameworks in line with regional standards;
- To formalise and regulate artisanal and small-scale mining (ASM);
- To engage governments, civil society, and the private sector in the responsible governance of natural resources.

The Lusaka Declaration significantly sharpened the RINR's focus by explicitly targeting 3TG minerals as the first designated minerals under its framework. This emphasis marks a clear departure from the broader scope outlined in the 2006 ICGLR Protocol on the Fight against the Illegal Exploitation of Natural Resources¹, which referred to "natural resources" in general without specifying particular commodities.

As such, the RINR is unique in Central and East Africa as the only regionally owned initiative with a formal political mandate to address the conflict dimension of mineral resources. Its strength lies in combining technical tools with institutional legitimacy, allowing it to engage a wide range of stakeholders in a politically endorsed, regionally driven framework. Through this mechanism, the RINR provides a platform for aligning national approaches, fostering trust among Member States, and sustaining coordinated regional dialogue on natural resource governance.

¹ Available at: https://ungreatlakes.unmissions.org/sites/default/files/icglr_protocol_against_the_illegal_exploitation_of_natural_resourcess.pdf

1.3 RINR Governance

The governance structure of the RINR is anchored in the institutional framework of the ICGLR and is designed to enable coordination, implementation, and oversight across national and regional levels:

- **Regional Inter-Ministerial Committee and Summit of Heads of State and Government:** These bodies provide general political oversight, strategic direction, and reaffirm Member States' commitment to the ICGLR's overall agenda.
- **ICGLR Secretariat:** Based in Bujumbura, Burundi, the Secretariat is the central coordination body for the ICGLR's initiatives, including the RINR. It supports Member States, facilitates regional dialogue, manages technical partnerships, and reports on progress.
- **Regional Committee:** Comprising national representatives, the Regional Committee convenes to review progress, validate decisions, and ensure that implementation remains regionally coherent and politically anchored.
- **Audit Committee:** This independent, regionally mandated body is responsible for accrediting third-party auditors and overseeing their assessments of mine sites and exporters. Composed of representatives from government, industry, and civil society, it ensures transparency, credibility, and consistency in the implementation of ICGLR certification standards across Member States.
- **National Coordination Mechanisms (NCMs):** Each Member State operates a National Coordination Mechanism that is meant to oversee the implementation of ICGLR initiatives, including the RINR, at the national level. These mechanisms are meant to connect various ministries, engage civil society and private sector actors, and ensure alignment with ICGLR standards.
- **Technical Unit on Natural Resources:** Located within the Secretariat, this unit provides technical support and guidance to Member States specifically on RINR implementation. It helps to develop tools, coordinate training, and ensure harmonised monitoring and reporting.

Together, these institutions form a comprehensive governance system that blends political legitimacy with technical expertise - essential for tackling the complex and cross-border nature of mineral-related conflict in the Great Lakes Region.

1.4 The six tools of the RINR

The RINR is structured around six operational tools, each designed to address a specific dimension of natural resource governance:

Table 1: Introduction to the six RINR tools

Tool	Name	Objective ²
1	Regional Certification Mechanism (RCM)	To provide a regional system for certifying the origin and supply chain of designated minerals (3TG) to ensure they are conflict-free and sourced in compliance with ICGLR standards.
2	Harmonisation of National Legislations	To ensure that Member States adopt and integrate ICGLR standards and protocols into national legislation in order to create a coherent legal framework for natural resource governance across the region.
3	Regional Database on Mineral Flows	To collect, manage, and share data on mineral production and trade among Member States, enabling traceability and transparency of mineral flows across the region.
4	Formalisation of Artisanal and Small-Scale Mining (ASM)	To promote the integration of ASM into formal economies, thereby improving governance, traceability, working conditions, and economic development in mining communities.
5	Extractive Industries Transparency Initiative (EITI) Peer Learning	To strengthen transparency and accountability in the extractive sector by encouraging the application of EITI principles and fostering peer learning among Member States.
6	Whistleblowing Mechanism	To provide a secure, confidential mechanism for reporting incidents of illegal exploitation, human rights abuses, and corruption within the mineral sector, while protecting the identity and safety of whistleblowers.

Together, these tools aim to create a transparent and secure system for responsible mineral sourcing, while enhancing national capacities and reducing the drivers of violence.

² Descriptions of the six tools are adapted from the Overview of the ICGLR Regional Initiative on the Fight against the Illegal Exploitation of Natural Resources (2024), one of the only publicly available official documents that outlines the objectives and structure of the six tools. Available at: https://icglr.org/wp-content/uploads/2024/03/ICGLR-Regional-Certification-Mechanism-Manual-2nd-Edition_Final.pdf

1.5 Why this study?

At the 6th Regional Meeting of Ministers in charge of Mining in 2021, the Member States representatives acknowledged the uneven progress in implementing the RINR's six tools. Recognising the imperative for an in-depth evaluation, the Ministers recommended the establishment of an ad hoc Commission to assess the precise implementation of the six tools in each member state.

In response, a dedicated sub-committee was created to review the status of implementation and propose updates to strengthen the framework's effectiveness and relevance. This evaluation builds on the mandate given to the sub-committee by the ministerial meeting to systematically assess how the six tools have been operationalised across all 12 ICGLR Member States, what barriers and enablers for their implementation exist, and how the RINR can adapt to current regional dynamics.

1.6 Research Objectives

The purpose of this study is to provide a robust and impartial evaluation of the RINR framework and its tools. Specifically, it aims to:

- Assess the level of implementation of each of the six tools across Member States;
- Identify common challenges, enabling conditions, and country-specific dynamics;
- Evaluate the continued relevance of the RINR;
- Offer practical recommendations to improve the effectiveness and strategic direction of the initiative.

1.7 Significance

This study holds critical significance as it assesses 15 years of regional effort to confront the complex relationship between natural resource exploitation and conflict. Its findings are intended to guide policy and institutional reforms, reinvigorate regional coordination, and enhance the ICGLR's capacity to lead in promoting sustainable peace, security, and development across the Great Lakes Region. By fostering transparency and accountability, the research aims to contribute to the emergence of a conflict-free mineral sector—one that supports inclusive economic growth, protects communities, and reinforces long-term stability.

1.8 Way Forward

This report is a starting point for deeper reflection and collective action. It is intended to serve as a technical foundation for Member States, the ICGLR Secretariat, and regional stakeholders to:

- Review and revise the design of the RINR tools to ensure they remain fit for purpose;
- Align national implementation strategies with evolving political and economic realities;
- Reinforce regional dialogue and coordination mechanisms under the ICGLR framework;
- Identify targeted areas for technical support, capacity building, and institutional investment.

The ultimate goal is to inform a renewed, shared vision for the RINR.

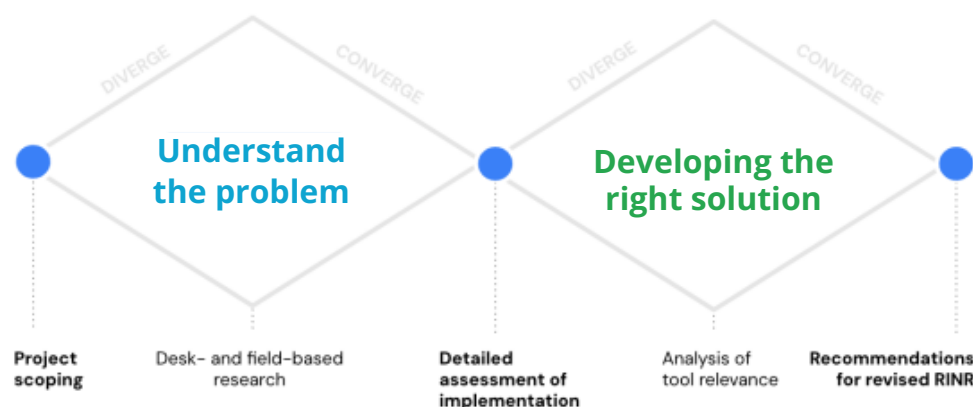
Methodology and data collection

2.1 Introduction

This section outlines the methodology and data collection approach used to evaluate the implementation of the six tools of the RINR across the 12 ICGLR Member States. For the evaluation, the research team applied a multi-method approach that combined qualitative and quantitative data, field visits to 9 countries, virtual consultations with 3 additional Member States, and over 150 interviews and focus groups with government representatives, civil society actors, the private sector, and development partners.

To ensure analytical rigor and comparability across diverse country contexts, the evaluation was grounded in a common theory of change for each tool and guided by the double diamond framework a structured, iterative approach to problem-solving and evaluation. Data was triangulated across sources and analysed using an assessment matrix built around four key dimensions: implementation, effectiveness, impact, and inclusivity.

Figure 1: Double Diamond Framework



2.2 Conceptual Framework

To structure and guide the research process, the Double Diamond Framework (figure 1) - an iterative, four-phase approach that provided a structured roadmap for exploring problems deeply, generating potential solutions, and responding to emerging insights was adopted for this study. The four phases included:

- **Discover:** Broadly identifying implementation challenges and opportunities across Member States through document review, field visits, and stakeholder interviews.
- **Define:** Narrowing the focus by synthesising findings and refining the core questions for each tool, informed by stakeholder input and Theory of Change logic.
- **Develop:** Exploring potential responses and redesign options through comparative analysis and stakeholder feedback.
- **Deliver:** Consolidating the findings into a validated set of recommendations, co-developed with ICGLR stakeholders and tested for feasibility and alignment.

2.3 Theory of Change

A theory of change was developed for each of the six tools, serving as the foundation for analysis (Annex 2). This framework articulates the intended outcomes, activities, and causal pathways for each tool, ensuring a clear and systematic evaluation. The theory of change was used as the basis for the assessment and interview guideline.

For each of the RINR's tools, the theory of change highlights:

- **Outcomes:** Enhancing regional collaboration on natural resource governance.
- **Activities:** Capacity-building workshops, policy harmonisation, and monitoring frameworks.
- **Causal Pathways:** Logical connections between these activities, intermediate outcomes (e.g., improved governance), and ultimate impacts (e.g., reduced resource-related conflicts).

By anchoring our analysis in this framework, the study applies a common methodology to assessing the implementation, effectiveness, and impact of each tool across the 12 ICGLR member states with clarity and consistency despite the different contexts and levels of implementation across countries.

2.4 In-country visit to 9 Member States

Our methodology combined qualitative and quantitative techniques to provide a comprehensive evaluation. This included visits to 9 countries (Burundi, Central African Republic, Democratic Republic of the Congo, Kenya, Rwanda, South Sudan, Tanzania, Uganda, and Zambia) during which interviews and focus groups were conducted in person. The analysis of the remaining 3 Member States (Angola, Republic of Congo, and Sudan) was done virtually.

Stakeholder input was captured via:

- **Interviews:** Semi-structured interviews with over 150 stakeholders, including government officials, civil society representatives, private sector actors, and international organizations. These interviews highlighted contextual challenges and progress made.
- **Focus Groups:** Group discussions facilitated collective insights and discussions, enabling better assessment of information by comparing and confronting ideas and perspectives. This approach helped confirm hypotheses and refine the analysis across different contexts.

Focus group in Kinshasa, DRC (Nov 2024)



2.5 The Assessment Matrix

To evaluate the implementation of the RINR tools, an assessment matrix was completed using data collected through interviews, focus groups, and surveys. A set of standardised criteria was applied to each tool across all Member States, enabling comparisons and identifying regional patterns and trends.

The criteria were based on each tool's theory of change and focused on four key dimensions:

- **Implementation:** The degree of progress made in putting the tool into practice, including the establishment of required structures, processes, and operational mechanisms.
- **Effectiveness:** The extent to which the tool has delivered its intended outcomes as articulated in its Theory of Change. This includes assessing whether key outcome-level results were achieved.
- **Impact:** The broader social, economic, environmental, or governance changes that can be credibly linked to the tool. This considers both intended and unintended effects over the medium to long term.
- **Inclusivity:** The extent to which the tool has ensured equitable access, participation, and benefits across different population groups, with particular attention to gender, marginalised communities, and affected stakeholders.

Surveys were conducted in countries where implementation was more advanced, providing deeper insights into success factors and ongoing challenges.

Findings from interviews, focus groups, and surveys were triangulated to ensure consistency and accuracy. By combining qualitative and quantitative methods and prioritising local engagement through in-person visits and collaboration with local stakeholders, the analysis aimed to generate practical, grounded insights.

2.6 A Four-Color Scale

To evaluate the implementation status and effectiveness of each of the six RINR tools across the 12 ICGLR Member States, a standardised Assessment Results Matrix has been developed. This matrix utilises a colour-coded system to visually represent the level of implementation, effectiveness, impact and inclusion of each tool in each country. The colour codes are defined as follows:

(-) No Color: Not Relevant: The tool or dimension is not relevant in the national context due to structural, legal, or strategic reasons. Its absence does not indicate a shortcoming or failure.

Level 0 - Grey: Not Initiated / No Evidence: There are no meaningful activities, outcomes, or effects observed. The tool has not been deployed, is entirely inactive, or has no identifiable uptake, results, or reach. Institutional awareness or interest may be minimal or nonexistent.

Level 1 - Yellow: Early Stage / Limited Progress: Initial steps have been taken, or isolated measures exist. Some degree of implementation, effect, or stakeholder engagement is visible, but it is limited in scale, quality, or coverage. Results or uptake are fragmented or inconsistent, and the tool is not yet achieving meaningful change.

Level 2 - Orange: Established / Moderate Progress: The tool is operational with clear signs of use, outcomes, or benefits. Most core elements are in place, and the tool is making a noticeable difference. However, important limitations remain - such as uneven quality, low coverage, or limited sustainability - that reduce overall effectiveness or reach.

Level 3 - Green: Fully Operational / Significant Impact: The tool is well-established, systematically applied, and delivers strong, measurable results. It is integrated into institutional routines, reaching intended beneficiaries, and producing outcomes aligned with the RINR's goals. Inclusion is broad, feedback mechanisms are functional, and sustainability is likely.

2.7 Research Challenges

The research process encountered several challenges, including:

Access to stakeholders: Logistical barriers limited access to certain groups or individuals in remote locations. In such cases, we adapted by engaging local civil society organizations to bridge gaps.

Data availability: Inconsistent or incomplete data posed challenges for comparative analysis. We mitigated this by leveraging secondary data and triangulating findings.

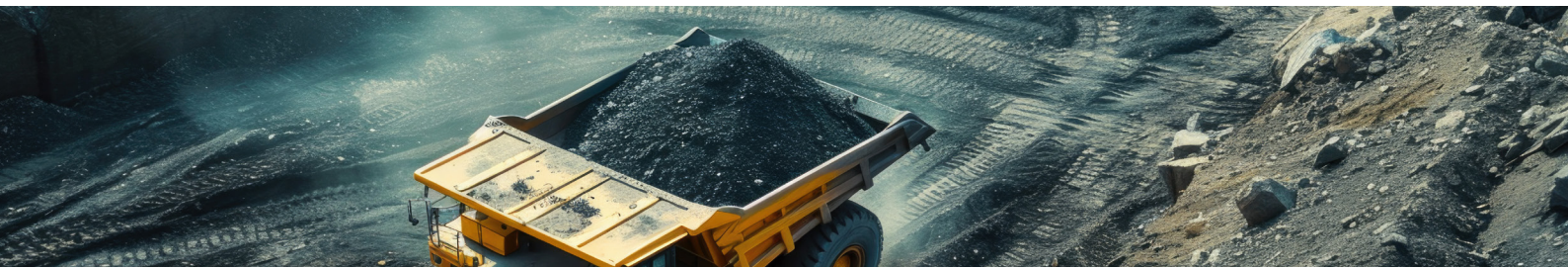
Cultural and linguistic Diversity: Cultural and linguistic diversity required that research tools be adapted to local contexts, with translations and culturally appropriate phrasing validated by local experts.

Specific tool-related challenge regarding Tool 6 (Whistleblowing Mechanism): Unlike the other RINR tools, Tool 6 lacks a regional standard, guidance document, or clearly defined objectives and implementation methods. As a result, there is no coherent framework against which national-level efforts can be meaningfully assessed. While Section 2.8 – Deep Dive per Member State – describes relevant national initiatives related to whistleblowing, the tool is not assigned a numeric rating in the assessment tables. This is due to the absence of an agreed baseline or benchmark for measuring progress.

2.8 Ethical Considerations

Ethical principles were integrated throughout the research process. Key measures included:

- **Informed Consent:** Participants were briefed on the study's purpose and their rights.
- **Confidentiality:** Data was anonymised to protect participant identities.
- **Cultural Sensitivity:** Research tools were designed to respect local customs and norms, with the support of local experts.



SECTION 2

This section presents a detailed, country-by-country assessment of the implementation of the RINR's six tools across ICGLR Member States. The analysis highlights each country's progress, challenges, and priorities, offering a grounded understanding of how the RINR is being translated into practice on the ground.

Each Deep Dive includes:

- Contextual overview of the country's mining sector and the relevance of the RINR;
- Key findings, drawing attention to innovations, gaps, and enabling factors;
- Tool-by-tool assessment.



1. ANGOLA

1.1 Mineral resources in Angola

Angola is one of Africa's leading oil producers and has long depended on hydrocarbons as the backbone of its economy. The government is actively promoting the mining sector - with important deposits of diamonds, gold, copper, iron ore, phosphates, and rare earth elements - as a key pillar of its national strategy to diversify away from oil dependence. Many of the deposits for these minerals have been confirmed and delineated through geological surveys conducted in recent years.

Angola's Mining Code (Law No. 31/11, 2011) provides for small-scale mining under a regulated licensing regime. More recently, Law No. 8/24 ("Law to Combat Illegal Mining Activity", July 2024), together with various presidential decrees, has strengthened oversight and introduced penalties for unauthorized extraction. In practice, this legal framework effectively criminalizes unlicensed artisanal mining, while small-scale mining remains permitted when conducted under valid licenses.

1.2 RINR Implementation

Angola has been an active participant in the committees and technical platforms of the ICGLR' RINR, viewing it as a valuable framework for peer learning and advancing regional cooperation on responsible mineral governance. Although Angola has concretized planning for RINR with the adoption of its national roadmap in 2019, effective and implementation efforts only gained momentum in 2022.

Angola's stance on the RINR is shaped by a clear preference for industrial mining: drawing on decades of hydrocarbons-sector regulatory experience. Based on this experience, the government prioritizes large-scale, capital-intensive operations. Within the non-industrial segment, licensed small-scale mining is encouraged, whereas artisanal mining is discouraged and effectively illegalized under recent anti-illegal-mining measures. As a result, several ASM-focused RINR tools have limited applicability, and Angola's implementation emphasis skews toward instruments aligned with industrial and licensed small-scale production.

1.3 Six Tool Assessment Key Findings

Angola is in the early stages of implementing the RINR tools. Initial steps have been taken to align national legislation with the Regional Certification Mechanism and to domesticate the ICGLR Protocol, though no concrete reforms have yet been adopted. Plans are in place to develop a national mineral flows database focused on gold by the end of 2025. The country has joined the EITI and submitted its second report in 2024, with validation completed in June 2025.

1.4 Assessment of the 6 RINR tools

Table 2: Tool Overview Angola

TOOLS	Implementation	Effectiveness	Impact	Inclusivity
Tool 1 RCM	0	0	0	0
Tool 2 Harm	0	0	0	0
Tool 3 RDMF	0	0	0	0
Tool 4 ASM Form	0	0	0	0
Tool 5 EITI	3	2	1	2

Legend:

(-) Not Relevant

Level 0 - Not Initiated / No Evidence

Level 1 - Early Stage / Limited Progress

Level 2 - Established / Moderate Progress

Level 3 - Fully Operational / Significant Impact

Source: Data collected by POTS in November 2024

Tool 1 - Regional Certification Mechanism: Angola has not yet initiated implementation of the RCM but begun internal discussions on aligning its legal framework. Progress is contingent on potential amendments to the Mining Code. Any implementation would focus on gold, as Angola does not currently exploit 3Ts.

Tool 2 - Harmonisation of National Legislations: Angola supports the Protocol's objectives but notes that some provisions appear less directly aligned with its priority of developing a predominantly industrial mining sector. Angola therefore favours implementation modalities that offer flexibility and allow emphasis on measures consistent with its regulatory model and investment plans, while engaging with ASM-related elements in a manner proportional to national policy priorities.

Tool 3 - Regional Database on Mineral Flows: Angola operates national mineral-sector databases and an online digital mining cadastre. The country is planning to establish an ICGLR-compliant national database on gold to interface with the Regional Database on Mineral Flows.

Tool 4 - Formalisation of Artisanal and Small-Scale Mining: Angola differentiates clearly between artisanal and small-scale mining. While licensed small-scale mining is permitted, artisanal mining (unlicensed, low-tech extraction) is discouraged and subject to enforcement. Accordingly, Angola does not support the formalisation of artisanal mining and has opted not to implement the ASM formalisation tool. A national focal point has been appointed for regional coordination.

Tool 5 - EITI Peer Learning: Angola joined the EITI on 16 June 2022 and was validated against the 2019 standard in June 2025. The country submitted its second EITI report in September 2024.

Tool 6 - Whistleblowing Mechanism³: Angola has not established a formal whistleblower mechanism specific to the mining sector.

2. BURUNDI

2.1 Mineral resources in Burundi

Burundi hosts a diversified suite of mineral deposits, including 3TG, nickel, titanium, lithium, beryl, iron, and rare earth elements. The sector is dominated by ASM, engaging an estimated 30,000–34,000 workers - about two-thirds of whom produce gold and the remainder mine 3T ores.

The ASM sector faces challenges including, environmental degradation, corruption, and limited institutional oversight. Recent reforms - including the introduction of the 2023 Mining Code and the corresponding implementation texts - aim to bolster regulation and enhance traceability. These reforms reflect a broader strategic ambition to formalize ASM, reduce illicit trade, and integrate mineral governance into national development priorities. These steps are meant to position mining as a strategic growth sector.

2.2 RINR Implementation

Burundi views the implementation of the RINR as a strategic opportunity to strengthen state control over mineral production, increase domestic revenues, and attract investment into its ASM-dominated mining sector. Recent legal reforms have laid the groundwork for improved oversight and traceability, particularly for 3T minerals.

As a country with an ambitious reform agenda for the mining sector, Burundi stands to benefit significantly from the structured support, peer learning, and technical guidance embedded in the RINR. The ICGLR platform provides not only a roadmap for strengthening governance, but also a channel to amplify national reform efforts and access capacity-building opportunities.

2.3 Six Tool Assessment Key Findings

Building on recent legal and policy reforms, Burundi has made notable progress in implementing the ICGLR's six tools. The RCM is the most advanced, with legal, institutional, and technical foundations in place, including traceability of 3T minerals and site inspection protocols. The updated mining code also aligns closely with ICGLR standards, and older ministerial orders on certification and inspection are under revision.

³ Unlike the other tools, Tool 6 lacks a regional standard or implementation guidance against which progress can be measured. As such, no numeric rating was assigned. See Section 2.6 for further explanation.

Progress has also been made on formalisation and data systems, though gaps remain. Similarly, while a national mineral database exists, it remains basic in design and will require further investment to meet regional interoperability standards. On transparency and accountability, Burundi has renewed its commitment to EITI, with institutional structures and a national work plan in preparation.

2.4 Assessment of the 6 RINR tools

Table 3: Tool Overview Burundi

TOOLS	Implementation	Effectiveness	Impact	Inclusivity
Tool 1 RCM	2	1	0	1
Tool 2 Harm	2	2	1	1
Tool 3 RDMF	1	1	0	0
Tool 4 ASM Form	2	2	2	1
Tool 5 EITI	1	0	0	0

Legend:

(-) Not Relevant

Level 0 - Not Initiated / No Evidence

Level 1 - Early Stage / Limited Progress

Level 2 - Established / Moderate Progress

Level 3 - Fully Operational / Significant Impact

Source: Data collected by POTS in November 2024

Tool 1 - Regional Certification Mechanism: Burundi has made significant progress in implementing the RCM, with core legal, institutional, and technical components now in place. The 2023 Mining Code and its implementing texts integrate ICGLR standards, and Burundi's mining authority (Office Burundais des Mines et Carrières, OBM) has been tasked with the implementation of the RCM-related provisions. Site inspection tools aligned with the RCM Manual are in use, and traceability of 3T minerals is conducted via tablet-based data collection. 201 ICGLR certificates were issued between 2019 and 2025, while 250 mining sites were inspected and qualified between 2015 and June 2025.

Tool 2 - Harmonisation of National Legislations: Interview partners in Burundi consider the domestication of the Protocol on Natural Resources as completed. The Mining Code promulgated in August 2023, together with implementing regulations adopted in November 2023 and January 2025, reflects alignment with regional standards. The government is also revising earlier ministerial orders on certification and inspection (from 2013 and 2015).

Tool 3 - Regional Database on Mineral Flows: A national database on mineral flows has been operational since 2016, and a licensing management software was introduced in 2024. However, the existing system is relatively basic in structure and functionality, and further efforts will be required in regard to systems and staff capacity to eventually ensure full alignment with the ICGLR's RDMF.

Tool 4 - Formalisation of Artisanal and Small-Scale Mining: Strategies to support formalisation are embedded in the 2023 Mining Code and the 2022 Mining Policy. A key element of the formalisation approach is the organization of miners into cooperatives, which serve as the legal entry point for obtaining licenses and help structure production, accountability, and engagement with traceability systems. Capacity-building efforts and sensitization campaigns are ongoing, with civil society and government actors supporting the integration of informal miners into the regulated sector.

Tool 5 - EITI Peer Learning: Burundi has expressed renewed interest in the Initiative and has actively started efforts toward EITI candidacy. This renewed momentum aligns with institutional advances made over the past year, including the appointment of the Minister in charge of mining as national EITI champion and the development of a formal EITI work plan.

Tool 6 - Whistleblowing Mechanism⁴: Burundi has not established a formal whistleblower mechanism specific to the mining sector. However, local administration, the police, and the Office Burundais des Mines et Carrières serve as public interfaces for reporting and receiving information related to illegal activities in the sector.

⁴

Unlike the other tools, Tool 6 lacks a regional standard or implementation guidance against which progress can be measured. As such, no numeric rating was assigned. See Section 2.6 for further explanation.

3. CENTRAL AFRICAN REPUBLIC

3.1 Mineral resources in CAR

The Central African Republic (CAR) is endowed with a wide range of mineral resources, including gold, diamonds, copper, iron ore, uranium, and rare earth elements. However, active extraction remains limited to gold and diamonds. While industrial mining is minimal, ASM gold production has expanded rapidly in recent years. The associated illicit trade continues to pose major challenges to state oversight and revenue collection.

The government has adopted a National Gold Strategy and updated its Mining Code in 2024 to tackle these challenges. The reforms introduce a gold certification system, reinforce traceability and due diligence, and extend regulatory oversight across the sector. Together, these steps aim to curb illicit flows, strengthen institutional governance, and lay the groundwork for formalisation and responsible investment.

3.2 RINR Implementation

The CAR views the RINR as a critical framework for rebuilding trust and control in its mineral sector after years of armed conflict and institutional collapse. The country's 2013 suspension from the Kimberley Process marked a turning point, and the full lifting of that suspension in 2024 has helped reintegrate CAR into legal mineral trade. This experience has laid the groundwork for adopting similar governance standards under the RINR, particularly in relation to gold.

Inspired by the ICGLR's Regional Gold Strategy, CAR has developed its own national strategy aimed at formalising artisanal gold supply chains, introducing a gold certification system, and reducing illicit flows. These efforts signal strong political will, even as key implementation decrees are still under preparation.

CAR places high importance on peer learning and regional cooperation to strengthen implementation. The RINR provides both a technical and political platform to support this, helping CAR to demonstrate conflict-free sourcing, and expand responsible trade across borders.

3.3 Six Tool Assessment Key Findings

CAR has prioritised gold traceability to fight against smuggling and increase revenues. The 2024 Mining Code introduced reforms aligned with the Kimberley Process and Article 20 refers to the ICGLR standards.

Data management remains a major gap. CAR's authority responsible for the diamond and gold sector (Bureau d'Évaluation et de Contrôle de Diamant et d'Or, BECDOR) maintains gold and diamond records, but systems are paper-based and fragmented, limiting future integration with ICGLR databases. In contrast, formalisation efforts are advancing, including site mapping, miner outreach, and improved licensing. The National Gold Strategy draws from ICGLR guidance and offers a more coherent approach.

CAR rejoined the EITI in 2021 with an ASM-adapted model, but was suspended again in 2024 due to reporting failures and civil society concerns.

3.4 Assessment of the 6 RINR tools

Table 4: Tool Overview Central African Republic

TOOLS	Implementation	Effectiveness	Impact	Inclusivity
Tool 1 RCM	1	1	1	1
Tool 2 Harm	2	2	1	0
Tool 3 RDMF	1	0	0	0
Tool 4 ASM Form	2	1	1	1
Tool 5 EITI	2	1	0	0

Legend:

(-) Not Relevant

Level 0 - Not Initiated / No Evidence

Level 1 - Early Stage / Limited Progress

Level 2 - Established / Moderate Progress

Level 3 - Fully Operational / Significant Impact

Source: Data collected by POTS in November 2024

Tool 1 - Regional Certification Mechanism: In line with its resource profile, CAR has prioritised gold certification to reduce smuggling and improve revenue collection. An inspection manual and data collection system support traceability of ASM gold from mine to export. However, no targeted regulations have yet domesticated the RCM, and the ICGLR's site/exporter status system is not yet applied.

Tool 2 - Harmonisation of National Legislations: A new Mining Code was adopted in August 2024, introducing important reforms related to traceability, formalisation, and transparency in the mineral sector. The Code places particular emphasis on the Kimberley Process, with detailed provisions on diamond certification, chain of custody, and institutional roles aligned with KPCS requirements. While the Code reflects international standards in regard to KPCS implementation, it does not contain explicit references to ICGLR systems, leaving room for further alignment through secondary legislation.

Tool 3 - Regional Database on Mineral Flows: Detailed records on gold and diamond mining and trade are stored by the CAR's authority responsible for the two precious minerals (Bureau d'Évaluation et de Contrôle de Diamant et d'Or, BECDOR). However, data remains paper-based and decentralised, with a centralised digital version maintained by a mining statistics department. The absence of interoperable software will hamper integration with ICGLR systems.

Tool 4 - Formalisation of Artisanal and Small-Scale Mining: Formalisation of the artisanal mining sector is a national priority for CAR, given its central role in gold and diamond production. Recent steps include geo-referencing of active sites, awareness-raising for miners, and improved licensing of artisanal operators and buying houses. While limited state presence in mining zones continues to pose challenges, the recently adopted National Gold Strategy reflects several elements of the ICGLR's related guidance and offers a more structured framework for advancing the process.

Tool 5 - EITI Peer Learning: The Central African Republic (CAR) joined the EITI in 2007, became a candidate country in 2008, and was declared compliant in March 2011. CAR rejoined the EITI process in 2021 under an adapted implementation approach, following a long suspension due to political instability since 2013. The 2024 Mining Code emphasises beneficial ownership and excludes politically exposed persons from mining activities. However, the country was suspended in November 2024 for failing to publish mining contracts and for breaches of the civil society protocol.

Tool 6 - Whistleblowing Mechanism⁵: CAR has not established a formal whistleblower mechanism specific to the mining sector. Alerts are currently managed informally through inspections and the mining police.

⁵ Unlike the other tools, Tool 6 lacks a regional standard or implementation guidance against which progress can be measured. As such, no numeric rating was assigned. See Section 2.6 for further explanation.

4. REPUBLIC OF CONGO

4.1 Mineral resources in the Republic of Congo

The Republic of the Congo is a long-standing oil producing country and one of sub-Saharan Africa's top petroleum exporters. Oil accounts for about 70% of state revenue. However, in recognition of the risks linked to overdependence on hydrocarbons, the government has increasingly turned its attention to other extractive resources as part of a broader economic diversification agenda.

The ASM sector plays a vital socio-economic role, particularly in rural areas with limited livelihood alternatives. Gold and diamond extraction dominate ASM activity, which has expanded steadily - government sources estimate a 20% increase in the number of miners over the past decade. The Republic of the Congo also has geological occurrences of tin, tungsten, and tantalum, with limited 3T extraction taking place in designated zones, but no broad-based 3T industry to date.

4.2 RINR Implementation

Drawing on decades of experience in managing the petroleum sector, Congo understands the importance of regional and international standard setting, transparency frameworks, and peer learning in promoting sustainable resource governance. The RINR offers a relevant platform to extend such principles to the mining sector.

The Republic of the Congo regards the RINR as a strategic framework that aligns with national priorities to support economic diversification and the strengthening of governance in the extractive sector. Although the country's economy remains heavily reliant on oil production, there is growing recognition of the role that improved management of ASM - particularly gold and diamonds - could play in boosting non-oil revenues, creating jobs, and reducing illicit financial flows.

4.3 Six Tool Assessment Key Findings

Congo has recently begun to take concrete steps towards the implementation of the RINR. The RCM which is legally anchored through a decree and a national database adapted to ICGLR standards is under development. Broader legal harmonisation efforts are ongoing but remain incomplete.

ASM formalisation is a stated priority, with a national strategy and action plan for the development of the sector in place, though actual implementation has been limited. Congo remains active in the EITI process, covering oil, mining, and forestry, but has yet to establish a formal whistleblower mechanism for the mining sector.

4.4 Assessment of the 6 RINR tools

Table 5: Tool Overview Republic of Congo

TOOLS	Implementation	Effectiveness	Impact	Inclusivity
Tool 1 RCM	1	0	0	1
Tool 2 Harm	2	0	0	1
Tool 3 RDFM	1	1	0	1
Tool 4 ASM Form	1	0	0	1
Tool 5 EITI	3	2	1	2

Legend:

(-) Not Relevant

Level 0 - Not Initiated / No Evidence

Level 1 - Early Stage / Limited Progress

Level 2 - Established / Moderate Progress

Level 3 - Fully Operational / Significant Impact

Source: Data collected by POTS in May 2025

Tool 1 - Regional Certification Mechanism: The Republic of the Congo has taken the foundational steps toward the implementation of the RCM. The Ministry in charge of Mines has been designated as the national focal point, and awareness-raising sessions have been conducted with institutional stakeholders. Legal anchoring was established through Décret n°2022-411 of July 2022, which sets out the modalities for the national application of the RCM. Ahead of issuing ICGLR certificates, the Ministry is currently finalizing the procedural guide and certificate template.

Furthermore, the new Mining Code was adopted on 8 and 10 April 2026, by both chambers of Parliament. In this strengthened new law, several key provisions have been introduced, including:

- a requirement for local processing (mineral beneficiation and value addition),
- local content and skills transfer,
- provisions requiring the rehabilitation of sites after exploitation.

In summary, particular emphasis is placed on the sustainable management of the mining sector.

Tool 2 - Harmonisation of National Legislations: The adoption of Decree No. 2022-411, marks an important step toward legal alignment with other RCM-implementing Member States. Beyond this, wider efforts towards the domestication of the Protocol are ongoing but have yet to produce tangible outcomes.

Tool 3 - Regional Database on Mineral Flows: Since 2019, the Republic of the Congo has been developing a dedicated national database on mineral flows adapted to ICGLR standards. A designated officer is in charge of managing this database and is also in charge of a separate national system for mineral data.

Tool 4 - Formalisation of Artisanal and Small-Scale Mining: The formalisation of the artisanal mining sector is widely recognised as a strategic priority. A national formalisation strategy has been developed, and initial steps toward implementation are underway; however, stakeholder consultations have underlined that few actual implementation steps towards its implementation have been taken so far.

Tool 5 - EITI Peer Learning: The Republic of the Congo joined the EITI in 2007, became a compliant country in 2013 and remains an active member. In March 2023, the country was validated under the 2019 EITI Standard. EITI implementation in Congo covers the hydrocarbons, mining, and forestry sectors, contributing to improved transparency and accountability across a broad spectrum of extractive activities.

Tool 6 - Whistleblowing Mechanism⁶: Congo has not established a formal whistleblower mechanism specific to the mining sector.

⁶ Unlike the other tools, Tool 6 lacks a regional standard or implementation guidance against which progress can be measured. As such, no numeric rating was assigned. See Section 2.6 for further explanation.

5. DEMOCRATIC REPUBLIC OF CONGO (DRC)

5.1 Mineral resources in the DRC

The DRC is the most mineral-rich country in the Great Lakes Region and plays a central role in global mineral supply chains. It is the world's leading producer of cobalt and a major source of copper, 3TG, and diamonds. The mining sector accounts for the bulk of the country's export earnings and is a key pillar of the national economy.

Alongside large-scale industrial operations, ASM is widespread and deeply embedded in the country's socio-economic fabric. ASM provides income for more than one million Congolese citizens. While the sector has long been associated with informal practices and conflict-related risks, it remains a vital livelihood source in many provinces.

Recent years have seen increased policy attention to the formalisation of ASM, the establishment of cooperatives, and the creation of designated artisanal mining zones (ZEAs). In parallel, the DRC has outlined a strategic ambition to capture more value domestically through improved traceability, local processing, and regulatory reforms. These efforts reflect a growing recognition that responsible mineral governance can serve as a driver of local development, stability, and economic resilience.

5.2 RINR Implementation Summary

The DRC has emerged as a regional leader in the implementation of the RINR's six tools. The dual pressures of the 2010 de facto export embargo, triggered by the Dodd-Frank Act in the United States, and the political momentum of the Lusaka Declaration provided a critical impetus for reforms. The DRC regards the RCM as central to curbing illicit mineral flows and asserting oversight over cross-border value chains.

The country's interest in the full implementation of the RINR remains particularly acute, as the eastern DRC continues to be affected by violent conflict and the presence of non-state armed actors involved in the mineral trade. The RCM is viewed as a vital tool for addressing these dynamics by fostering traceability and responsible sourcing throughout the supply chain.

Beyond its national efforts, the DRC actively promotes stronger regional engagement on the RINR. It has consistently encouraged other Member States to accelerate tool implementation to enhance the initiative's collective impact. DRC stakeholders emphasize that without wider participation and enforcement, the goals of responsible sourcing and conflict prevention in the Great Lakes Region cannot be achieved.

5.3 RINR Assessment Key Findings

The DRC is among the most advanced Member States in implementing the RCM. A robust legal framework, updated most recently through ministerial orders in 2023–2024, supports inspection, validation, and traceability processes. Legal harmonisation is well underway, with ICGLR standards reflected in national legislation governing certification, ASM cooperatives, and mine supervision.

The DRC compiles production and export data through the systems of the Artisanal and Small-Scale Mining Technical Support and Training Service (Service d'Assistance et d'Encadrement de l'Exploitation Minière Artisanale et à Petite Échelle, SAEMAPE) and the Mineral Evaluation, Assessment, and Certification Centre (Centre d'Expertise, d'Évaluation et de Certification des substances minérales précieuses et semi-précieuses, CEEC), respectively. While these databases are operational, integration and interoperability efforts are ongoing to improve institutional transparency. Formalisation of artisanal and small-scale mining is a national priority, guided by the Strategic Plan for Mining Sector Development (2022–2026).

The DRC has played a leading role in EITI, with strong institutional commitment since 2007. An automated online portal launched in 2021 has enhanced reporting by over 200 companies and government agencies. Although no dedicated national whistleblower system is in place, some community-based reporting efforts exist.

5.4 Assessment of the 6 RINR tools

Table 6: Tool Overview DRC

TOOLS	Implementation	Effectiveness	Impact	Inclusivity
Tool 1 RCM	2	2	3	2
Tool 2 Harm	3	2	2	2
Tool 3 RDMF	2	2	2	1
Tool 4 ASM Form	2	1	1	1
Tool 5 EITI	3	3	2	2

Legend:

(-) Not Relevant

Level 0 - Not Initiated / No Evidence

Level 1 - Early Stage / Limited Progress

Level 2 - Established / Moderate Progress

Level 3 - Fully Operational / Significant Impact

Source: Data collected by POTS in November 2024

Tool 1 - Regional Certification Mechanism: DRC is among the most advanced ICGLR Member States in implementing the RCM and regularly issues ICGLR certificates for mineral exports. Between 2014 and 2023, nearly 30,000 certificates were issued, supported by an evolving legal framework, including new ministerial orders in 2023–2024. Over 800 mine sites have been qualified, with 178 validated. The country also hosts regular third-party audits and is piloting new traceability initiatives such as the initiative for the traceability of artisanal gold (Initiative pour la traçabilité de l'or artisanal, ITOA). However, limited access to certain mining areas and funding constraints hinder consistent oversight.

Tool 2 - Harmonisation of National Legislations: The DRC has made substantial progress in aligning its legal framework with ICGLR standards. Key legal instruments have been revised and adopted to support the updated RCM and formalisation guidance. The implementation of specific ministerial orders in 2023 and 2024 has created a coherent regulatory framework for certification, mine site validation, and traceability.

Tool 3 - Regional Database on Mineral Flows: The DRC has been contributing data to pilot versions of the ICGLR's regional database through two main platforms: SAEMAPE's database for production and mapping of artisanal mining sites, and CEEC's export monitoring database. These systems provide detailed and structured information on the country's mineral flows. National efforts to improve interoperability between the systems and integrate them more fully are ongoing, with a view to strengthening data transparency and accessibility across relevant institutions.

Tool 4 - Formalisation of Artisanal and Small-Scale Mining: ASM formalisation is a priority under the DRC's national Strategic Plan for Mining Sector Development (2022–2026), which emphasises institutional structuring, cooperative development, and improved governance. More than 1,400 cooperatives have been identified to support the transition from informal to formal mining operations. The country has also developed local monitoring mechanisms such as Local Monitoring Committees (Comités Locaux de Suivi, CLS) to reinforce coordination at both the community and administrative levels. Legal provisions related to Artisanal Mining Zones (Zones d'Exploitation Artisanale, ZEAs) and cooperative oversight are being implemented progressively. These efforts aim to create a more stable, regulated, and inclusive ASM sector that contributes to rural development and revenue mobilisation.

Tool 5 - EITI Peer Learning: DRC has been a member of the Extractive Industries Transparency Initiative (EITI) since 2007. In 2022, DRC was validated against the 2019 EITI Standard. The launch of an automated online EITI portal in 2021 has further modernized reporting by over 200 companies and government agencies. Moreover, the DRC has been including information from the artisanal sector in the EITI report since 2023.

Tool 6 - Whistleblowing Mechanism⁷: DRC has not established a formal whistleblower mechanism specific to the mining sector on a national scale. However, groundwork for reporting mechanisms has been done, including through community-based channels.

7

Unlike the other tools, Tool 6 lacks a regional standard or implementation guidance against which progress can be measured. As such, no numeric rating was assigned. See Section 2.6 for further explanation.

SPOTLIGHT

ZAMBIA-DRC EV Economic Zone

Zambia and DRC to implement an Innovative transboundary battery and Electric vehicle Special Economic Zone

In a landmark move towards Africa's clean energy future, Zambia and the Democratic Republic of Congo (DRC) are set to implement a Transboundary Battery and Electric Vehicle Special Economic Zone (SEZ).

This initiative seeks to leverage the two nations' rich mineral resources—accounting for 70% of key battery minerals—to establish a robust electric vehicle and battery value chain. The initiative aligns with the continent's broader ambitions to transition towards renewable energy and economic transformation, with projections indicating that the global battery electric vehicle market could reach \$46 trillion by 2050. As Africa positions itself at the heart of the clean energy revolution, this project represents a strategic step toward sustainable industrialization, job creation, and value addition in the region.

Source: United Nations Economic Commission for Africa. (2024, April 15). Zambia and DRC to implement an innovative transboundary battery and electric vehicle special economic zone.

6. KENYA

6.1 Mineral resources in Kenya

Kenya is endowed with a wide range of mineral resources, including titanium, gold, rare earth elements, and industrial minerals. While the mining sector plays a less prominent role in the national economy compared to agriculture, tourism, or services, it holds strategic importance as part of Kenya's diversified economic base.

Thanks to its geographic location and infrastructure, Kenya serves as a regional hub for mineral transit and trade. The port of Mombasa and Jomo Kenyatta International Airport in Nairobi are vital gateways for the export of minerals from landlocked countries such as Uganda, Rwanda, South Sudan, and DRC.

Although mining currently contributes a modest share to GDP, the sector holds strong growth potential - particularly through the development of mineral value chains and increased value addition. The Government of Kenya also sees significant revenue potential in the formalisation of ASM, which could unlock broader economic benefits while improving environmental and social outcomes.

6.2 RINR Implementation

While progress in the implementation of the six tools has so far been limited in Kenya, the country has consistently expressed strong interest in Tool 4. More recently, Kenya has shown increased engagement around mineral value addition and the potential introduction of the RCM, particularly in light of the ongoing development of 3TG deposits. These emerging priorities signal a growing commitment to implementing additional RINR instruments.

As a key transit country for minerals originating from landlocked neighbors, Kenya has also received numerous ad-hoc requests for judicial cooperation concerning specific mineral shipments. The responsible authorities have investigated these cases accordingly, underscoring the need for more formal and coordinated mechanisms to manage cross-border mineral flows and curb illicit trade.

6.3 RINR Assessment Key Findings

Kenya's confirmed tantalum discovery has accelerated its commitment to the RINR, with the Ministry of Mining prioritising RCM implementation. Regulatory drafting has begun, and legislative harmonisation is underway through amendments to the Mining Act and customs laws. However, domestication of the ICGLR Protocol has not yet started.

A digital Royalty Management System is in advanced testing and will replace current manual data collection. Integration with the ICGLR regional database is planned at a later stage. ASM formalisation has gained momentum, with the creation of Artisanal Mining Committees and preparations for a national gold refinery to boost traceability and local value addition.

6.4 Assessment of the 6 RINR tools

Table 7: Tool Overview Kenya

TOOLS	Implementation	Effectiveness	Impact	Inclusivity
Tool 1 RCM	1	0	0	0
Tool 2 Harm	1	0	0	0
Tool 3 RDMF	1	0	0	0
Tool 4 ASM Form	1	1	0	1
Tool 5 EITI	0	0	0	0

Legend:

(-) Not Relevant

Level 0 - Not Initiated / No Evidence

Level 1 - Early Stage / Limited Progress

Level 2 - Established / Moderate Progress

Level 3 - Fully Operational / Significant Impact

Source: Data collected by POTS in November 2024

Tool 1 - Regional Certification Mechanism: Kenya's January 2024 confirmation of tantalum ore in six counties has accelerated commercialization planning. With a view to capturing more public revenue from upcoming exports, the Ministry of Mining, Blue Economy and Maritime Affairs has committed to making the RCM a prerequisite for formal mineral exports. Initial implementation steps are underway, coordinated by a dedicated ministerial team: the required legal and institutional framework has been mapped, and the drafting of implementing regulations has begun.

Tool 2- Harmonisation of National Legislations: Kenya initiated amendments to its Mining Act 2016. Furthermore, amendments to the Customs and Excise Act Cap 472 are necessary and foreseen for the implementation of the RCM. Targeted domestication of the Protocol on Natural Resources has not yet started and requires executive intervention.

Tool 3 - Regional Database on Mineral Flows: A digital Royalty Management System (RMS) has progressed to deployment. The RMS is designed to capture both production and export data and is expected to improve data reliability and timeliness. Interfaces with the ICGLR regional database have not yet been established and will require further alignment.

Tool 4 - Formalisation of Artisanal and Small-Scale Mining: Formalisation has become a strategic priority, particularly in response to the rapid growth of ASM gold mining across several regions. The upcoming opening of a gold refinery forms part of this broader strategy to strengthen traceability and promote local value addition. To support these efforts, Artisanal Mining Committees have been established to serve as local-level structures for oversight of ASM operations. In parallel, the Ministry of Mining, Blue Economy and Maritime Affairs is working on the designation of official ASM zones.

Tool 5 - EITI Peer Learning: Kenya is not currently a member of the EITI and the Government has indicated no active interest in pursuing accession at this time.

Tool 6 - Whistleblowing Mechanism⁸: Kenya has not established a formal whistleblower mechanism specific to the mining sector. However, the country maintains a robust general legal framework for whistleblower protection through instruments such as the Witness Protection Act. Oversight of the mineral trade is further strengthened by financial compliance measures.

⁸ Unlike the other tools, Tool 6 lacks a regional standard or implementation guidance against which progress can be measured. As such, no numeric rating was assigned. See Section 2.6 for further explanation.

7. RWANDA

7.1 Mineral resources in Rwanda

Rwanda holds deposits of tin, tantalum, tungsten (3Ts), gold, and rare earth elements. While the country does not have large-scale industrial mines, its mineral exports contribute substantially to foreign exchange earnings. The sector is predominantly driven by ASM, with 3T minerals accounting for the bulk of production and exports.

Over the past two decades, Rwanda has invested considerable effort in formalising its ASM sector and encouraging the transition toward small-scale, mechanised operations. The government has introduced licensing systems and inspection regimes to improve regulatory oversight and support legal compliance. Rwanda was also among the first countries in the region to adopt digital traceability systems.

In line with its broader economic strategy, Rwanda aims to establish itself as a regional hub for mineral trading and processing. The government has attracted investments in refining and smelting infrastructure and continues to position the country as a destination for value addition. These ambitions reflect a deliberate effort to increase domestic gains from the mineral sector and integrate it more fully into Rwanda's long-term development trajectory.

7.2 RINR Implementation

Rwanda has demonstrated sustained commitment to the RINR since its inception. The country was among the first to operationalize the RCM, integrating ICGLR standards into national traceability and export procedures. It has also been at the forefront of RINR-related innovations, particularly in regard to the digitization of mineral traceability systems and the formalization of ASM operations. For these aspects, Rwanda serves as a model within the region.

Looking ahead, Rwanda's key interest lies in strengthening the economic dimension of the RINR. The government sees value in using the Initiative to support formal cross-border trade and consolidate its role as an exporter in the region.

7.3 RINR Assessment Key Findings

Certification and traceability systems have been in place in Rwanda since 2013. Today, the RCM is supported by five licensed CoC providers and regular mine inspections. Sixteen third-party audits have been conducted, and full digitization of services is planned by 2026.

The country has completed legal alignment with RINR requirements. The 2024 Mining and Quarry Operations Law embeds ICGLR provisions. Rwanda operates the MCIS database, which connects national production and traceability data to the regional system in real time.

ASM formalization and transparency are also well advanced. Miners are organized into licensed cooperatives. Rwanda is preparing to join EITI in 2025.

7.4 Assessment of the 6 RINR tools

Table 8: Tool Overview Rwanda

TOOLS	Implementation	Effectiveness	Impact	Inclusivity
Tool 1 RCM	2	1	0	1
Tool 2 Harm	3	2	1	1
Tool 3 RDMF	2	2	1	2
Tool 4 ASM Form	3	2	2	2
Tool 5 EITI	1	0	0	0

Legend:

(-) Not Relevant

Level 0 - Not Initiated / No Evidence

Level 1 - Early Stage / Limited Progress

Level 2 - Established / Moderate Progress

Level 3 - Fully Operational / Significant Impact

Source: Data collected by POTS in January 2025

Tool 1 - Regional Certification Mechanism: Rwanda is among the most advanced ICGLR Member States in implementing the RCM, with operational certification and traceability procedures in place since 2013. All mineral exports require an ICGLR certificate, supported by five licensed CoC systems and regular mine inspections. Sixteen third-party audits have been conducted to date. Rwanda also aims to fully digitize mineral certification and traceability services by 2026 to streamline operations and reduce costs.

Tool 2 - Harmonisation of National Legislations: Rwandan government stakeholders consider the domestication processes as completed. The mining and quarry operations law was gazetted in June 2024.

Tool 3 - Regional Database on Mineral Flows: Rwanda operates the Mineral Certification Information System (MCIS), established in 2017. This online platform will serve as the national interface for the ICGLR's regional database and manages data on mine site inspections, mineral production, and traceability. The system is fully integrated into the national certification workflow and enables real-time monitoring.

Tool 4 - Formalisation of Artisanal and Small-Scale Mining: Formalisation of ASM operations has been a policy priority in Rwanda for the last two decades. Since 2013, miners have been organized into licensed cooperatives or companies and provided with regular training on taxation and environmental compliance. A National Action Plan on ASM was developed and implemented. Formalization efforts continue to evolve within the broader mining reform agenda.

Tool 5 - EITI Peer Learning: Rwanda is actively working toward EITI accession, with plans to join the international initiative by 2025. Ongoing discussions between the Rwanda Mines, Petroleum, and Gas Board (RMB), EITI Secretariat, and national stakeholders are focused on finalizing the institutional setup. Preparations are underway for the publication of the country's first EITI report, anticipated in 2025.

Tool 6- Whistleblowing Mechanism⁹: Rwanda has not established a formal whistleblower mechanism specific to the mining sector. However, a toll-free number and email address for reporting of violations related to RCM standards were set up.

8. SOUTH SUDAN

8.1 Mineral resources in South Sudan

Since independence, South Sudan's extractive sector has been dominated by oil production, which remains the mainstay of its economy. In recent years, however, the government has taken steps to develop its nascent mining sector, including initiating geological mapping campaigns and hosting investment delegations. The 2016 institutional split between the Ministry of Petroleum and the newly established Ministry of Mining has created clearer lines of responsibility and improved oversight for the mineral sector.

South Sudan's mining activity is concentrated in artisanal gold extraction, with no confirmed production of 3T minerals to date. Gold is predominantly mined by artisanal operators, though a number of small-scale operations are also emerging. ASM is regulated at two levels. At the state level, artisanal mining is under the mandate of state governments, but most have yet to develop their own regulatory frameworks. As a result, formalization of artisanal mining has not advanced, even though artisanal gold mining is long-standing and widespread. Small-scale mining is regulated on a national level by the Ministry of Mining.

8.2 RINR Implementation

As the newest Member State of the ICGLR, South Sudan is approaching the RINR from an early implementation stage, with limited existing institutional capacity and technical systems in the mining sector. Nevertheless, the country has expressed strong political interest in the RINR, particularly in tools related to ASM formalisation, and data governance.

Authorities have underlined the value of the RINR as a platform for structured peer learning, offering access to tested standards and legal models that can guide national reform. The country's ambition to improve governance in its artisanal gold sector aligns closely with RINR objectives, and efforts are underway to integrate elements of the regional framework into South Sudan's evolving mining policy landscape.

8.3 RINR Assessment Key Findings

Implementation of the RINR tools in South Sudan remains limited. The RCM is not currently being implemented. The 2012 Mining Act provides for artisanal mining licensing at the state level, but no licenses have been issued. Small scale mining is formal, the Ministry of Mining issues licenses to the companies. In late 2023, Parliament began reviewing amendments to the Mining Act aimed at curbing gold smuggling and streamlining licensing, with a new Mining Code expected by 2026.

⁹ Unlike the other tools, Tool 6 lacks a regional standard or implementation guidance against which progress can be measured. As such, no numeric rating was assigned. See Section 2.6 for further explanation.

Artisanal mining remains largely informal, with limited progress toward formalization. South Sudan is not an EITI member; although interest was expressed in 2012, no roadmap for joining the process has been developed to date.

8.4 Assessment of the 6 RINR tools

Table 9: Tool Overview South Sudan

TOOLS	Implementation	Effectiveness	Impact	Inclusivity
Tool 1 RCM	0	0	0	0
Tool 2 Harm	1	0	0	0
Tool 3 RDMF	0	0	0	0
Tool 4 ASM Form	1	0	0	0
Tool 5 EITI	-	-	-	-

Legend:

(-) Not Relevant

Level 0 - Not Initiated / No Evidence

Level 1 - Early Stage / Limited Progress

Level 2 - Established / Moderate Progress

Level 3 - Fully Operational / Significant Impact

Source: Data collected by POTS in November 2024

Tool 1 - Regional Certification Mechanism: The RCM is not currently implemented in South Sudan.

Tool 2 - Harmonisation of National Legislations: South Sudan's mining sector continues to be governed by the 2012 Mining Act. However, in late 2023, Parliament began reviewing amendments to this legislation aimed at curbing gold smuggling and improving the licensing process. These efforts signal a step toward modernizing the regulatory framework and bringing it closer in line with international and regional standards. A new Mining Code is under development and expected to be adopted by 2026.

Tool 3 - Regional Database on Mineral Flows: South Sudan does not yet operate a national mineral data management system. Stakeholders highlighted the lack of a centralized and digitized database as a key gap.

Tool 4 - Formalisation of Artisanal and Small-Scale Mining: Although the 2012 Mining Act foresees licensing of artisanal miners, the absence of actual license issuance has meant that Artisanal Mining remains largely informal. Responsibility for Artisanal Mining governance lies at the state level, but there has been limited progress toward formalization. The Ministry of Mining issues licenses to small scale mining companies.

Tool 5 - EITI Peer Learning: South Sudan is not currently a member of the EITI. In 2012, the president expressed willingness to join EITI but to date a roadmap has not yet been developed.

Tool 6 - Whistleblowing Mechanism¹⁰: South Sudan has not established a formal whistleblower mechanism specific to the mining sector.

9. SUDAN

9.1 Mineral resources in Sudan

Sudan's extractive sector was historically dominated by oil, but the 2011 secession of South Sudan triggered a sharp decline in oil revenues and pushed the country to reposition gold as its primary source of foreign exchange. Over the past decade, gold has become Sudan's most valuable mineral export, supporting both state revenues and a large informal economy. The sector is split between a relatively limited number of industrial operations and a large ASM sector.

The ongoing civil war has effectively dismantled the governance of the extractive sector. State institutions have lost control over key territories and data systems. Gold production and exports have become a major source of income for non-state armed actors. Formal licensing processes have been replaced in some areas by informal arrangements. The collapse of oversight mechanisms, growing militarization of gold sites, and the erosion of data transparency all point to a gold sector that is deeply entangled in conflict dynamics and regional illicit trade networks.

9.2 RINR Implementation

The ongoing conflict has severely impacted Sudan's institutional capacity to continue the implementation of the RINR. The Ministry of Minerals is operating with a reduced number of staff, and access to several mining regions remains restricted. Large volumes of sector data, including records on production, licensing, and exports, have reportedly been lost or rendered inaccessible due to the destruction of government facilities.

Despite these setbacks, the RINR offers a valuable framework for Sudan's eventual recovery and reform of the mineral sector. Rebuilding efforts with the ICGLR can build on a solid foundation of earlier national reforms. These reforms had focused on formalising artisanal mining, improving licensing systems, and strengthening state control over gold exports. Once conditions allow, the RINR tools - particularly those on certification, data systems, and legal harmonisation - could support the restoration of oversight, reinforce traceability, and reduce the risk of conflict financing.

¹⁰ Unlike the other tools, Tool 6 lacks a regional standard or implementation guidance against which progress can be measured. As such, no numeric rating was assigned. See Section 2.6 for further explanation.

9.3 RINR Assessment Key Findings

Sudan has taken legal steps broadly aligned with RINR objectives, particularly through the adoption of the Artisanal Mining Regulations in 2022 and broader sector reforms focused on formalization and transparency. These developments were part of ongoing national reforms rather than a direct response to ICGLR instruments, but they nonetheless create openings for future alignment—especially in the areas of ASM governance and licensing.

Implementation of the six RINR tools remains limited. The RCM is not yet operational, and there are gaps in data management, whistleblower protections, and regional coordination. Political instability and institutional constraints continue to slow progress, but national stakeholders have expressed interest in learning from ICGLR peers and gradually integrating regional approaches into Sudan's evolving mineral governance framework.

9.4 Assessment of the 6 RINR tools

Table 10: Tool Overview Sudan

TOOLS	Implementation	Effectiveness	Impact	Inclusivity
Tool 1 RCM	1	0	0	0
Tool 2 Harm	1	0	0	1
Tool 3 RDMF	1	1	0	0
Tool 4 ASM Form	1	1	0	0
Tool 5 EITI	-	-	-	-

Legend:

(-) Not Relevant

Level 0 - Not Initiated / No Evidence

Level 1 - Early Stage / Limited Progress

Level 2 - Established / Moderate Progress

Level 3 - Fully Operational / Significant Impact

Source: Data collected by POTS in November 2024

Tool 1 - Regional Certification Mechanism: Sudan has not yet begun formal implementation of the RCM. However, the national traceability scheme for gold developed under the amended Mining Act (2022) incorporates conceptual elements inspired by the RCM and the ICGLR Gold Strategy. These include provisions on mineral certification, CoC, and institutional oversight through the Sudanese Mineral Resources Company (SMRC). While this alignment reflects political will to improve transparency and control in the gold sector, effective implementation is not progressing, mainly due to the ongoing conflict.

Tool 2 - Harmonisation of National Legislations: Sudan's legal reforms in the mining sector have advanced in recent years as part of broader institutional efforts to improve governance and attract investment. The Artisanal Mining Regulations of 2022 introduced clearer definitions and oversight mechanisms for ASM activities. These reforms build on the Mineral Wealth and Mining Development Act of 2015, which remains the core legal framework for the sector. While not specifically framed around ICGLR alignment, the evolving legal framework incorporates elements of Protocol and Model Law.

Tool 3 - Regional Database on Mineral Flows: Sudan had set up a national database on mineral production and trade, hosted by the Geological Research Authority of Sudan (GRAS). A part of the data has been lost due to the ongoing conflict and efforts are currently being undertaken to recover the missing datasets.

Tool 4 - Formalisation of Artisanal and Small-Scale Mining: Given the scale of ASM and the sector's growing contribution to national gold production, formalisation had become a core component of Sudan's gold sector strategy prior to the conflict. In 2022, the government adopted a specific regulation on artisanal mining, which aimed to improve licensing, monitor production sites, and introduce environmental and safety standards. Parallel efforts focused on centralising gold purchases through state-affiliated entities. These measures sought to reduce smuggling and increase fiscal returns from ASM. However, implementation remained partial and is now fully on hold.

Tool 5 - EITI: Sudan is not currently a member of the EITI, but the government has expressed interest to join the EITI. A ministerial committee which includes all relevant authorities was established.

Tool 6 - Whistleblowing Mechanism¹¹: Sudan has not established a formal whistleblower mechanism specific to the mining sector.

11

Unlike the other tools, Tool 6 lacks a regional standard or implementation guidance against which progress can be measured. As such, no numeric rating was assigned. See Section 2.6 for further explanation.

10. TANZANIA

10.1 Mineral resources in Tanzania

Tanzania is one of the major mineral-producing countries on the African continent, with an established industrial mining sector and an important ASM economy. The country hosts large-scale gold and gemstone operations that contribute significantly to export revenues.

Over the past decade, ASM has expanded and contributed to the livelihoods of Tanzanians, particularly in rural areas. Recognising the sector's potential, the government has undertaken a series of reforms to formalise ASM, including the establishment of mineral trading centers and improved licensing frameworks.

At the policy level, there is a strong emphasis on ensuring that Tanzania benefits more directly from its natural resources. This has led to a strategic focus on mineral beneficiation and value addition, with measures to promote local processing, enhance domestic participation in value chains, and retain a greater share of mineral wealth within the national economy. These priorities are shaping a minerals sector that is aligned with Tanzania's broader development goals.

10.2 RINR Implementation

Tanzania has emerged as a committed implementer of the six tools of the RINR, with particular strengths in the formalisation of ASM. As both a mineral-producing and transit country, Tanzania has recognised the value of strengthening oversight and transparency through tools such as RCM and the Regional Database.

Tanzania's key interest moving forward is to retain greater mineral value within the country by deepening formalisation, strengthening domestic processing capacity, and positioning itself as a hub for mineral-based industrialization. The RINR provides a strategic platform to advance these goals, and Tanzania is well-placed to play a leading role in shaping the next phase of regional cooperation. This applies particularly to further innovating in formalisation efforts, and cross-border initiatives that enhance the economic benefit across the mineral value chain.

10.3 RINR Assessment Key Findings

Tanzania has made solid progress in implementing several tools of the RINR. The RCM is operational, with key legal frameworks in place and the issuance of first certificates. The domestication of the Protocol is considered complete, anchored by the 2019 Certification Regulations which reflect core elements of the RCM Manual.

Digital systems are being strengthened to improve oversight and coordination. The Mineral Markets Management Information System is currently used to capture ASM-related data and would form the backbone of Tanzania's contribution to the Regional Database. Efforts are also underway to link this platform with other data sources.

Tanzania stands out as a leader in formalising ASM through its Minerals Market approach and newly introduced Primary Processing Licence. Tanzania EITI continues to drive transparency, with recent validation under the 2019 EITI Standard and legal provisions for disclosing contracts and beneficial ownership.

10.4 Assessment of the 6 RINR tools

Table 11: Tool Overview Tanzania

TOOLS	Implementation	Effectiveness	Impact	Inclusivity
Tool 1 RCM	2	1	1	0
Tool 2 Harm	3	2	2	1
Tool 3 RDMF	2	1	0	0
Tool 4 ASM Form	2	2	2	1
Tool 5 EITI	3	3	2	2

Legend:

(-) Not Relevant

Level 0 - Not Initiated / No Evidence

Level 1 - Early Stage / Limited Progress

Level 2 - Established / Moderate Progress

Level 3 - Fully Operational / Significant Impact

Source: Data collected by POTS in November 2024

Tool 1 - Regional Certification Mechanism: Tanzania is among the RCM-implementing Member States. The necessary legal and institutional frameworks have been established, using the CoC-system set up by government institutions. First third-party audits of exporters have been undertaken. The establishment of RCM-compliant mineral export procedures is currently underway, with 15 certificates already issued to mineral importers.

Tool 2 - Harmonisation of National Legislations: Interview partners in Tanzania consider the domestication of the Protocol on Natural Resources as completed. The key piece of legal text for the implementation of the RCM is the Mining (Designated Minerals Certification) Regulations, 2019 which translate key elements of the RCM Manual into Tanzanian law.

Tool 3 - Regional Database on Mineral Flows: The Mineral Markets Management Information System serves as the national database capturing information from ASM activity and trade and is therefore also the relevant interface for the RDMF. The Ministry of Minerals is currently working on integrating this system with other mining sector data sources - such as the cadaster, EITI reporting, and Mining Commission data - into a unified digital platform to enhance data coordination.

Tool 4 - Formalisation of Artisanal and Small-Scale Mining: Tanzania is a regional leader in developing and implementing formalisation solutions for the ASM sector. The Minerals Market concept - established to regulate and legalise mineral trading - has become the centerpiece of the country's approach and is widely regarded as a best practice within the ICGLR framework. Oversight of ASM is led by Regional Mines Offices, and the government has recently introduced a new Primary Processing Licence (PPCL) specifically tailored to ASM operators, allowing them to carry out basic mineral processing legally and under formal regulation.

Tool 5 - EITI Peer Learning: Tanzania joined EITI in 2009 and has since made steady progress in strengthening transparency and accountability in the extractive sector. The country underwent validation under the 2019 EITI Standard in 2023. The 2019 Extractive Industries Act Regulations make the disclosure of contracts and beneficial ownership information obligatory.. TEITI's approach and innovations are regularly shared as best practices during regional peer-learning events.

Tool 6 - Whistleblowing Mechanism¹²: Tanzania has not established a formal whistleblower mechanism specific to the mining sector. However, enforcement of mining laws and community-level engagement are facilitated through Mines Resident Officers (MROs) stationed in each region. These officers serve as key interlocutors for the local population and play a central role in monitoring compliance and addressing grievances related to mining activities.

SPOTLIGHT

TANZANIA'S MINERALS MARKET

Tanzania's Minerals Markets system, launched in 2019, aims to formalise ASM, boost revenue, and improve transparency in mineral trading. Since then, 43 mineral markets and 109 buying centers have been established nationwide. These regulated hubs facilitate legal ASM sales, reduce smuggling, ensure fair pricing, and enhance tax and royalty collection.

Supporting this physical infrastructure is the Mineral Market Management Information System, a digital platform launched in 2021 by the Mining Commission. The MMMIS captures real-time data on mineral transactions, allowing for improved traceability, regulatory oversight, and integration with other national systems. Together, the market network and MMMIS have significantly advanced ASM formalisation in Tanzania. The system is now viewed as a model for improving traceability, enhancing compliance, and enabling future integration with regional tools like the ICGLR's RCM and RDMF.

Source: Ministry of Minerals (Tanzania). (2025, April/May). The Tanzanian government continues to improve the small-scale mining sector through infrastructure development, legal reforms, and financial support.

¹² Unlike the other tools, Tool 6 lacks a regional standard or implementation guidance against which progress can be measured. As such, no numeric rating was assigned. See Section 2.6 for further explanation.

11. UGANDA

11.1 Mineral resources in Uganda

Uganda is endowed with a range of mineral resources, including 3TG.. While a few industrial mining operations exist, the mineral sector is largely dominated by ASM. This is especially true in the gold and 3T sectors, which account for the bulk of Uganda's mineral production and employment.

Uganda is not yet considered a major mineral producer at the continental level, but its mineral base is expanding, and new developments are underway. To maximize domestic value from its resources, Uganda has introduced restrictions on the export of unprocessed minerals, including a long-standing ban on unrefined gold and tin exports.

In line with its industrialization goals, Uganda aims to become a regional destination for mineral processing and value addition. This ambition is reflected in recent private investments in gold and tin refining infrastructure. By promoting domestic beneficiation, the government seeks to retain more of the mineral value chain within the country.

11.2 RINR Implementation

Uganda was a late starter in RINR implementation but has shown growing commitment. The government views the RCM as key to improving traceability and accessing formal markets. Formalization of ASM and value addition have also gained prominence, leading to the integration of ICGLR standards into national legislation and procedures.

Uganda's ambition to become a regional hub for mineral trade and processing adds further relevance to RINR engagement. As both a producing and importing country, Uganda sees adherence to regional standards as essential for trade credibility and investor confidence. RINR tools are thus viewed as a means to support national reforms and strengthen Uganda's position in regional mineral supply chains.

11.3 RINR Assessment Key Findings

Uganda has made important strides toward implementing the RCM, with a legal framework in place, mine site inspections initiated, and one CoC system operational. RCM-compliant export procedures are also functional.

The country has achieved a high level of legal alignment with the RINR framework. The domestication of the Protocol on Natural Resources is considered complete, with key ICGLR provisions incorporated into the ICGLR Act (2018), its Regulations (2023), and the Mining and Minerals Act (2022).

Data systems for mineral production and export remain manual, though a needs assessment is underway to guide digitization. The formalization of ASM is advancing, with thousands of miners registered. Uganda's recent accession to EITI has already sparked constructive public dialogue, particularly on gold sector transparency.

11.4 Assessment of the 6 RINR tools

Table 12: Tool Overview Uganda

TOOLS	Implementation	Effectiveness	Impact	Inclusivity
Tool 1 RCM	2	1	1	2
Tool 2 Harm	2	2	1	2
Tool 3 RDMF	1	0	0	0
Tool 4 ASM Form	2	1	1	2
Tool 5 EITI	3	3	2	2

Legend:

(-) Not Relevant

Level 0 - Not Initiated / No Evidence

Level 1 - Early Stage / Limited Progress

Level 2 - Established / Moderate Progress

Level 3 - Fully Operational / Significant Impact

Source: Data collected by POTS in November 2024

Tool 1 - Regional Certification Mechanism: Uganda is recognized as an RCM-implementing country and has established the legal framework required for implementation. Technical tools for mine site inspection have been developed, and initial mine sites have already been inspected. Mineral traceability is operational through a CoC service provider, and RCM-compliant export procedures are in place. Despite these advances, actual uptake remains limited.

Tool 2 - Harmonisation of National Legislations: Interview partners in Uganda consider the domestication of the Protocol on Natural Resources as completed. This was achieved through the ICGLR Act of 2018 and its implementing Regulations of 2023. The Mining and Minerals Act, 2022 further embeds ICGLR/RINR requirements in national law and is operationalised by the Mining and Minerals (Licensing) Regulations, 2023 and the Mining and Minerals (Artisanal and Small-Scale Mining) Regulations, 2024. Collectively, these measures place Uganda at an advanced stage of alignment with the RINR framework

Tool 3 - Regional Database on Mineral Flows: Uganda already captures production and export data through its digital mining cadastre. Building on this foundation, the government is prototyping a national database tailored to RCM and RDMF requirements.

Tool 4 - Formalisation of Artisanal and Small-Scale Mining: Uganda has established a strong foundation for ASM formalisation through recent policy and legislative measures. Under the Mining and Minerals Act 2022, artisanal miners are formally distinguished from small-scale operators, laying the groundwork for tailored regulation. The Biometric Registration of Artisanal and Small-scale Miners (BRASM) system, launched in 2019, has already registered over 6,800 miners, with nearly 39 licensed artisanal mining zones designated and 22 associations established.

Tool 5 - EITI Peer Learning: Uganda formally joined EITI in August 2020 and was validated against the 2019 standard in May 2024. The country's first three EITI reports have prompted meaningful public discussion, notably by highlighting discrepancies in gold production and export figures.

Tool 6 - Whistleblowing Mechanism¹³: Uganda does not yet operate a sector-specific whistleblowing mechanism for mining. Instead, reporting is anchored in the Whistleblowers Protection Act, 2010, under which government has piloted digital reporting channels, notably the Inspectorate of Government's online complaints portal and the State House Anti-Corruption Unit's web form and toll-free line. Within the sector, the Police Minerals Protection Unit (PMPU) of the Uganda Police Force is the designated enforcement arm and receives and investigates reports related to illegal mining activities.

¹³ Unlike the other tools, Tool 6 lacks a regional standard or implementation guidance against which progress can be measured. As such, no numeric rating was assigned. See Section 2.6 for further explanation.

12. ZAMBIA

12.1 Mineral resources in Zambia

Zambia counts among Africa's most established mining countries, with an industrial mining sector dominated by copper. In recent years, however, ASM has emerged as a rapidly expanding part of the sector, playing a growing role in local economies and rural employment.

ASM activity in Zambia is concentrated in gold, manganese, and gemstones. Mining has become a vital source of income in many regions. However, much of this activity remains informal and loosely regulated, making it difficult to quantify its full economic contribution. The government has recognised the potential of ASM to support inclusive development.

At the policy level, Zambia's focus is gradually shifting toward greater integration of ASM into the national mining strategy. There is growing interest in improving revenue collection, reducing illicit trade, and enhancing local value addition. These efforts reflect the country's broader ambition to diversify its mineral economy and increase the developmental impact of the sector beyond large-scale copper production.

12.2 RINR Implementation

Zambia has undertaken a series of mining sector reforms aimed at improving governance, formalising ASM, and strengthening institutional oversight. These efforts have increasingly brought Zambia into alignment with the principles and tools of the RINR. The reforms reflect domestic priorities, but also reinforce core elements of the Initiative, particularly in areas of transparency, data systems, and inclusive regulation.

In practice, Zambia's approach corresponds closely with Tools 3, 4, and 5 of the RINR, reflecting shared priorities around data management, ASM governance, and transparency. While the RCM is not perceived as relevant for Zambia, the country's experience in structuring ASM oversight and advancing formalisation offers relevant insights for other ICGLR Member States.

Zambia views the ICGLR platform as a valuable opportunity to learn from regional peers and contribute to cross-border collaboration. Its efforts to leverage the EITI process and invest in digital tools offer promising lessons for broader RINR implementation - especially if complemented by stronger support for environmental compliance, fiscal incentives, and long-term institutional capacity.

12.3 RINR Assessment Key Findings

Zambia does not implement the RCM. However, recent mining legislation reforms are well aligned with Tool 2, strengthening institutional oversight and regulatory frameworks, particularly for ASM.

Tools 3 and 4 are areas of strong progress. The MOSES system enhances domestic data collection, though gaps remain on mineral flows from neighbouring countries. Formalisation of ASM has advanced through new licensing systems, institutional measures, and support to cooperatives. Zambia is an active EITI member and uses MOSES to support transparent reporting, consistent with Tool 5.

12.4 Assessment of the 6 RINR tools

Table 13: Tool Overview Zambia

TOOLS	Implementation	Effectiveness	Impact	Inclusivity
Tool 1 RCM	0	0	0	0
Tool 2 Harm	2	1	0	1
Tool 3 RDMF	2	1	1	0
Tool 4 ASM Form	2	2	1	1
Tool 5 EITI	3	3	2	2

Legend:

(-) Not Relevant

Level 0 - Not Initiated / No Evidence

Level 1 - Early Stage / Limited Progress

Level 2 - Established / Moderate Progress

Level 3 - Fully Operational / Significant Impact

Source: Data collected by POTS in November 2024

Tool 1 - Regional Certification Mechanism: The RCM is not being implemented in Zambia at the moment.

Tool 2: Harmonisation of National Legislations: Zambia has introduced major legal reforms that are consistent with the objectives of Tool 2. The recent overhaul of mining legislation - including the enactment of the Minerals Regulation Commission Act and the revised Geological and Minerals Development Act - reflects a shift toward stronger institutional oversight and clearer regulatory frameworks for ASM. These changes clearly contribute to alignment with ICGLR principles.

Tool 3 - Regional Database on Mineral Flows: Zambia has made notable progress in strengthening national data systems, aligning with the objectives of Tool 3. The Ministry of Mines has deployed the Mineral Output Statistical Evaluation System (MOSES, see spotlight), a digital platform designed to capture production, licensing, and export data. While this system improves domestic oversight and revenue tracking, some data gaps remain - particularly with respect to mineral flows originating from neighbouring countries such as the DRC.

Tool 4 - Formalisation of Artisanal and Small-Scale Mining: Formalising ASM has become a central pillar of Zambia's mining sector reforms. A dedicated licensing system for ASM operators has been introduced, accompanied by institutional measures such as the planned creation of a specialised ASM department and expanded regional presence. Support for cooperative structures and technical assistance programmes further reinforce this trajectory. Although implementation is ongoing, Zambia's progress offers a strong example of how Tool 4 can be applied in practice to support inclusive and sustainable ASM governance.

Tool 5 - EITI Peer Learning: Zambia has been a member of the EITI since 2009 and was declared compliant in 2012. In 2021, Zambia was validated against the 2019 standard. Importantly, the Mineral Output Statistical Evaluation System (MOSES) plays a central role in Zambia's EITI implementation by supplying production, export, and licensing data directly to EITI and other public institutions.

Tool 6 - Whistleblowing Mechanism¹⁴: Zambia has introduced a dedicated whistleblowing channel for the mining sector. In June 2024, the Minister of Mines and Minerals Development launched the Ministry's Whistleblower Policy. The Ministry now hosts an online whistleblower portal for confidential reporting, with submissions managed within the Ministry and referred to the Anti-Corruption Commission (ACC) as appropriate. Reports can be lodged via the Ministry's online portal, by email, in person or through a toll-free phone number.

SPOTLIGHT

MOSES

MOSES, the Mineral Output Statistical Evaluation System, is a multi-stakeholder collaboration designed to track minerals, combat illicit trade practices like misinvoicing, and improve transparency and compliance within Zambia's mining sector. As a major copper producer, Zambia relies on MOSES to modernize monitoring of its entire mining value chain—key for reliable reporting, accurate statistics, and improved revenue collection.

MOSES tracks minerals from mine to the border. Companies submit monthly production reports electronically, reducing delays and enabling up-to-date national statistics. It also manages export permit applications and tracks exports, ensuring consistency between production and shipments. All data is stored in a single accessible database, improving oversight and simplifying compliance.

As a result, Zambia recovered approximately \$1 million in unpaid export dues from mining companies within a year of the system's 2016 pilot, demonstrating its effectiveness in recovering funds lost to illicit practices. Beyond direct revenue recovery, MOSES leads to improved operator compliance, produces consistent statistics for better-informed decision-making, and enhances data accuracy, serving as a potential model for other countries to gain greater control over their mineral wealth and combat illicit financial flow.

Source: UNCTAD. (2022, July 5). Mineral tracking tool helps Zambia combat illicit financial flows. United Nations Conference on Trade and Development.

¹⁴ Unlike the other tools, Tool 6 lacks a regional standard or implementation guidance against which progress can be measured. As such, no numeric rating was assigned. See Section 2.6 for further explanation.

SECTION 3

DEEP DIVE PER TOOL

This section presents an in-depth assessment of the implementation of the six tools of the ICGLR's Regional Initiative against the Illegal Exploitation of Natural Resources (RINR). Each tool reflects a key pillar of the RINR strategy, designed to improve governance, oversight, transparency, traceability, and accountability in the management of natural resources across the Great Lakes Region.

For each tool, the section outlines:

- Purpose and institutional design, including its objectives, functions, and theory of change;
- Implementation progress, highlighting legal, operational, and coordination efforts at both national and regional levels;
- Comparative findings based on structured criteria: execution, effectiveness, impact, and inclusivity;
- Strengths, weaknesses, opportunities, and threats (SWOT) observed across Member States.



Tool 1 - Regional Certification Mechanism (RCM)

1.1 Introduction

Rooted in the foundational documents of the ICGLR, the Regional Certification Mechanism (RCM) was established as the cornerstone of the RINR, adopted by ICGLR Member States with the objective of ensuring conflict-free 3TG value chains.

The RCM provides a structured framework for verifying the origin of mineral production and tracking its movement through national and cross-border supply chains. Its core components, namely mine site inspection and validation, Chain of Custody (CoC) systems, and independent third-party audits are designed to ensure that only minerals from compliant, conflict-free sources are entering the world market.

Theory of Change

The basis of the RCM are inputs and activities such as the establishment of mine site inspection and validation systems, the rollout of Chain of Custody (CoC) systems overseen by Member State governments, and regular third-party auditors to conduct independent assessments. Those constitute the foundation for transparent and credible mineral certification across the region.

These efforts are expected to result in outputs such as annual inspection and validation of mine sites, and the implementation of a fully functional CoC system up to the point of export. The CoC system should be capable of tracking mineral flows from mine to export level.

Expected short-term outcomes include increased transparency in mineral supply chains and improved detection and reporting of illegal mining activities. In the medium term, the tool promotes greater accountability in the minerals sector and more effective governance and control over mineral resources through regular validation, tracking, and compliance enforcement.

Ultimately, the desired impact is a more sustainable, conflict-free mineral sector that delivers enhanced economic benefits to ICGLR Member States through certified exports and contributes to long-term security and stability by reducing the role of armed groups in mining areas.

To track progress, the tool outlines assessment metrics at each stage, including the number of mine inspections, CoC system compliance, and validation ratings. These indicators assess whether certification is translating into more secure, traceable, and responsibly sourced mineral exports.

1.2 Implementation overview

The table below summarises RCM implementation across ICGLR Member States, covering legal status, operations, focus minerals, and effectiveness. Uptake is strongest in 3T-producing countries, with some gold-focused states beginning to engage. It reflects both technical progress and the RCM's broader role in oversight and responsible trade.

Table 13: Tool 1 - Status per country

Country	Legal Framework	RCM operations	Cert. Issued	Focus Minerals	Effectiveness Summary	Relevance Assessment	Remarks
Angola	In progress	No	No	Gold	Low – focus not on 3Ts	Low – no legal artisanal operations	Working on adapting to gold; evaluation ongoing
Central African Republic	In progress	No	No	Gold	Low – early-stage efforts	High – priority for gold sector governance	Inspection manual in place; decree for RCM domestication still pending
Burundi	Done	Done	Yes	3Ts	Moderate – structure exists	High – active traceability program	Framework in place; updates ongoing
Congo (Rep.)	Done	No	No	Gold, Tin, Tantalum	Moderate – intermediary -stage efforts	High – for gold sector	Decree issued 2022; further steps pending
DRC	Done	Yes	Yes	3Ts + Gold	High – fully integrated	Very High – region's main 3T exporter	Among most advanced Member States
Kenya	In progress	No	No	3Ts	Low – legal reform ongoing	Medium – growing artisanal sector	Renewed political interest, amending mining law.
Rwanda	Done	Yes	Yes	3Ts	Very High – strong digital tools	Very High - Processing Hub ambition	Among most advanced Member States
South Sudan	In progress	No	No	Gold	Low – Limited institutional capacities	Medium – relevant for gold exports	Start from low baseline .
Sudan	In progress	No	No	Gold	Low – current security situation does not allow implementation	Medium – relevant for gold exports	Currently no implementation due to civil war
Tanzania	Done	Yes	Yes	3Ts	High – certification and CoC in place	Very High – compliance-focused policy environment	Certifying importers; legal tools in place
Uganda	Done	Partial	Yes	3Ts	Moderate – implementation in progress	High – proactive in reforming mining law	Mainstreamed RCM Unit; procedures launched 2023
Zambia	In progress	No	No	Gold	Low – lacking focus on 3Ts	Medium	CoC tools exist; stakeholder work ongoing

1.3 Tool Analysis

A SWOT framework was used to guide the assessment, helping to identify the strengths and weaknesses of the tool's implementation, as well as the external opportunities and threats that may influence its impact and future potential.

Strengths

- **Improved oversight and monitoring of mineral supply chains:** RCM implementation has strengthened national systems for mine-site validation, chain-of-custody (CoC) monitoring, and export certification, improving government control of the mining sector in RCM-implementing Member States overall.
- **Robust technical and regulatory architecture:** Anchored in a detailed Certification Manual (2011, revised 2019), the RCM outlines clear procedures for inspections, audits, and data collection. This structure demonstrates the system's technical viability and alignment with global due diligence standards.
- **Data availability and transparency:** RCM activities generate structured data on mineral production and trade, providing a foundation for policymaking, enforcement, and responsible sourcing — though this potential remains largely unused.

Weaknesses

- **Significant implementation gaps in all implementing Member States:** No Member State has fully implemented all core RCM components. In some Member States, mine sites remain unvalidated, CoC systems are unreliable, or key exporters/traders are not audited.
- **Mismatch between original objectives and Member State perceptions:** While the RCM was originally conceived as a peacebuilding tool to curb the financing of armed groups through the mineral trade, it has not delivered a measurable impact in this regard. However, Member States value the RCM for its unintended but constructive role in strengthening national oversight and control for ASM.
- **Lack of alignment with industry recognition standards:** RCM certificates are not accepted by major international buyers or smelters. The Responsible Minerals Initiative (RMI) does not view ICGLR certification as sufficient for meeting conflict-free sourcing obligations, limiting market impact.
- **RCM data cannot be reconciled regionally:** Data collected through RCM activities (e.g., mine inspections, exports, CoC tags) are not transmitted or harmonised at the regional level, reducing the ability to analyse flows and detect anomalies.
- **High costs and limited funding:** The resource intensity of the RCM (especially audits and inspections) combined with limited national budgets threatens long-term sustainability.

Opportunities

- **Revitalising the RCM to address ASM gold trade:** Adapting the RCM model to suit the realities of the artisanal gold sector - a key priority for most Member States - could improve traceability, enhance enforcement, and make a contribution to reduce smuggling.
- **Credibility restoration through the Audit Committee's ad hoc commission:** The establishment of an ad hoc committee - mandated to investigate allegations of mineral smuggling - offers a crucial opportunity to restore the credibility of the RCM. While politically sensitive, the initiative demonstrates renewed commitment to regional dialogue and oversight.

Threats

- **Conflict and insecurity disrupt implementation and deter wider participation:** Ongoing conflict in mineral-rich areas undermines the functioning of certification systems and facilitates illicit mineral flows. Moreover, the RCM's limited demonstrable impact on reducing conflict financing makes it less attractive for other Member States to adopt or invest in full implementation, further weakening its regional legitimacy.
- **Inconsistent political will and low Member State trust:** Regional mistrust and diverging interests have blocked progress on harmonised implementation and weakened joint enforcement mechanisms.
- **Competitiveness risks for the private sector:** RCM-related compliance costs may render mineral exports from ICGLR countries less competitive compared to non-certifying jurisdictions, especially in the absence of buyer recognition.

1.4 Summary findings

The RCM is the central instrument of the ICGLR's Regional Initiative, designed to curb the financing of armed groups through the mineral trade by certifying 3T minerals as conflict-free. Based on a detailed Certification Manual, it provides procedures for mine validation, chain-of-custody (CoC) tracking, third-party audits, and export certification.

While it has not achieved its original objective of reducing conflict financing, Member States see value in its contribution to national oversight, particularly in the ASM sector. It has supported the development of traceability systems and generated structured data, even if that data remains underused.

Tool 2 - Harmonisation of National Legislations

2.1 Introduction

Tool 2 of the RINR aims to foster greater legal alignment among ICGLR Member States in the fight against the illegal exploitation of natural resources. Anchored in the 2006 Protocol on the Illegal Exploitation of Natural Resources and operationalised through the more detailed Model Law, this tool encourages Member States to domesticate shared principles, strengthen national legal frameworks, and align key provisions related to licensing, enforcement, and traceability.

The tool reflects a recognition that fragmented legal and regulatory systems undermine regional efforts to curb smuggling, formalise ASM, and ensure oversight of mineral supply chains. By harmonising laws, the ICGLR seeks to promote a level playing field, improve legal predictability for operators, and enable more effective cooperation among national authorities-especially in areas such as cross-border trade, prosecution of offences, and due diligence enforcement.

Theory of Change

The ToC for Tool 2 is based on inputs and activities, such as identifying legal discrepancies, reviewing national laws for inclusivity - especially for vulnerable groups - and engaging legal experts to support reform. These efforts are expected to produce outputs like the adoption of the ICGLR Model Law and revised national legislation.

These legal reforms aim to deliver short-term outcomes, including greater consistency across Member States' mining laws, increased legal protections for women and other vulnerable populations, and enhanced regional cooperation on mineral regulation. As reforms take hold, the medium-term outcomes focus on stronger enforcement of anti-illegal mining laws and improved accountability and governance within the sector.

Ultimately, the desired impact is a reduction in illegal mineral exploitation and related human rights abuses, contributing to long-term sector stability and diminishing the influence of armed groups in mining areas.

2.2 Regional implementation overview

The table below provides a snapshot of how ICGLR Member States are progressing in aligning their national legal frameworks with the ICGLR Protocol against the Illegal Exploitation of Natural Resources. It highlights the status of legislative reforms, institutional arrangements, and the extent of legal integration. The table underscores the varying pace of implementation and the importance of national context in adopting regional legal standard.

Table 14: Tool 2 - Status per country

Country	Harmonisation Status	Implementation Summary	Remarks
Angola	Early stages	Limited progress; considering national alignments	Evaluating national applicability
Burundi	Done	Mining code updated (2023); ordinances under revision	Active legal reform
Central African Republic	Done	New mining code adopted (2024); implementation decrees aligning with RCM pending	Strong political will; harmonisation ongoing; decree adoption needed
Rep. Congo	In progress	Legal framework and RCM decree established; several decrees and ministerial orders revised; active compliance	The revised Mining Code was adopted by both chambers of Parliament.
DRC	Done	Several decrees and ministerial orders revised; compliance active	
Kenya	In progress	Mining Act amendments pending (2025)	
Rwanda	Done	Fully integrated legal framework; Mining and Quarry Law gazetted (2024)	
South Sudan	In progress	2012 Mining Act under revision; new Mining Code expected (2026)	Institutional delays
Sudan	Early stages on hold	Mining Act and Artisanal Mining Regulations updated	Delay and disruption due to ongoing conflict
Tanzania	Done	Legal harmonisation completed; regulations in force since 2019	
Uganda	Done	ICGLR Act 2018, Regulations 2023 fully operational	
Zambia	In progress	Consultations ongoing; legislation expected 2025	

2.3 Tool Analysis

A SWOT framework was used to guide the assessment, helping to identify the strengths and weaknesses of the tool's implementation, as well as the external opportunities and threats that may influence its impact and future potential.

Strengths

- **Provides a regional legal reference point through the ICGLR Protocol and Model Law**, offering Member States a normative foundation for addressing illicit resource exploitation and reinforcing state authority.
- **Supports implementation of the RCM** by encouraging legal adjustments in licensing, traceability, and export regulation aligned with regional certification standards.
- **Reflects international best practices in responsible mineral sourcing and due diligence**, promoting convergence with global regulatory frameworks.

Weaknesses

- **The Protocol is broad and outdated**, limiting its current relevance as a guide for concrete legal reforms.
- **Legal harmonisation has been fragmented**, with most progress made in support of the RCM, but minimal action on the more impactful and politically sensitive area of export and fiscal harmonisation.

- **No shared vision exists regarding what Tool 2 should achieve in the next phase** - limiting collective momentum and strategic coordination.

Opportunities

- **Growing demand for legal coordination on high-impact issues:** There is increasing recognition of the need to align legal and regulatory frameworks in targeted areas such as fiscal regimes, cross-border trader licensing, and enforcement - creating a window for focused legal coordination efforts.
- **The existing Model Law offers a credible and regionally endorsed reference point that can be built upon to develop further model provisions and practical legal guidance,** especially in areas such as fiscal policy, cooperative regulation, or trader licensing. Clearer direction in these areas could support implementation of tools.

Threats

- **Diverging national reform** agendas may continue to widen the legal gap among Member States unless a clear and limited harmonisation agenda is set.
- **Ongoing insecurity and political volatility** in parts of the region may divert attention and resources away from legal reform.
- **Lack of binding mechanisms or compliance incentives weakens collective adherence to shared standards,** especially where reforms require politically sensitive decisions (e.g. tax harmonisation).

2.4 Summary findings

Member State representatives acknowledge the importance of a shared legal foundation for combating the illegal exploitation of natural resources, but there is no common understanding of what Tool 2 should aim to achieve in its next phase. Most legal harmonisation efforts to date have focused on enabling RCM implementation.

The broader objective of aligning legal and fiscal regimes remains largely unaddressed. While critical to curbing mineral smuggling and ensuring a level playing field - these issues have seen the least progress, due to its political sensitivity and potential economic trade-offs among Member States.

There is currently no dedicated platform or peer-review process under the RINR to systematically track, compare, or promote convergence of national legal frameworks.

Tool 3 - Regional Database on Mineral Flows (RDMF)

3.1 Introduction

Tool 3 establishes a centralised, regional data framework - with the Regional Mineral Database (RDMF) at its centre - designed to collect, manage, and analyse certified mineral data from all ICGLR Member States. It aggregates four critical data streams: mine-site inspection results, chain-of-custody records, and audit report and exporter certification documents.

The Tool's objective is to provide a data platform for oversight and early-warning functions, enabling stakeholders to track mineral flows within, between, and exiting the region. Through greater transparency, the database is meant to help identify anomalies-such as unverified sources or sudden surges in export volumes-which can signal high-risk or illicit activities.

The second edition of the ICGLR's RCM Manual (2019) details the RDMFs institutional and technical architecture:

- Member States maintain their own compatible national databases, which feed standardised data to the RDMF.
- The ICGLR Secretariat houses the RDMF Unit, responsible for data cleaning, server maintenance, and analytic query functions.
- Data access is tiered: public stakeholders receive aggregated insights, while the Regional Committee and relevant authorities can request granular datasets.
- The Manual mandates regular revisions of the RCM, including Tool 3, ensuring agile adaptation to emerging challenges.

Theory of Change

In regard to Tool 3, inputs and activities, such as developing and operationalising national databases to track mineral production and trade, collecting gender-disaggregated data, and training government officials in data collection and reporting constitute the basis. These activities are intended to establish consistent and reliable systems for capturing mine-site, trader, and exporter data in line with ICGLR standards.

These efforts are expected to produce outputs such as national databases that are regularly updated with production, chain of custody (CoC), and export data, and the submission of data to the ICGLR regional database for monitoring and verification.

These systems aim to deliver short-term outcomes, including improved transparency and traceability of mineral flows at the national level, and enhanced coordination between government agencies, mining operators, and exporters to ensure data accuracy and reliability. As national systems mature, the medium-term outcomes include increased compliance with national laws and ICGLR standards, based on more robust and systematic reporting.

Ultimately, the desired impact is a reduction in illegal mining and mineral smuggling, driven by better oversight, monitoring, and enforcement actions informed by the data. These systems also contribute to a more transparent and formalised mineral trade, reinforcing regional efforts to ensure conflict-free mineral exports.

3.2 Regional implementation overview

The table below outlines the status of national databases established by ICGLR Member States to support traceability and oversight of mineral flows. It covers the development and operational status of each database, the designation of focal points, and the relevance of these systems to national and regional priorities. The overview highlights varying capacities, infrastructure gaps, and the ongoing efforts to harmonise data systems with ICGLR standards.

Table 15: Tool 3 - Status per country

Country	Database Status	Operational Status	Focal Point Status	Relevance Assessment	Remarks
Angola	Initiated	Gold-focus	Established	Low	Specialised focus due to absence of 3Ts
Burundi	In Progress	Only basic database functions	Established	High	Continuous data capture; needs system strengthening for interoperability
Central African Republic	In Progress	centralised records maintained by BECDOR	Established	High	Gold and diamond data exist but limited digital infrastructure; integration challenges
Rep. Congo	Done	Database development ongoing; system not yet fully operational at the Mining Cadastre Directorate	Established	High	Adaptation of database to ICGLR standards ongoing
DRC	Done	Operational with ongoing integration and interoperability efforts	Established	Very High	Multiple databases; robust data sharing
Kenya	In Progress	Digital RMS established	Established	Medium	Infrastructure setup phase; aims for future integration
Rwanda	Done	Fully integrated into national certification and export systems	Established	Very High	Advanced online platform and traceability system
South Sudan	Initiated	No system operational	Established	Low	Lack of data systems; significant development needed
Sudan	In Progress	National mineral database exists but partly lost due to conflict	Established	Medium	Historical data recovery; data completeness efforts ongoing
Tanzania	Done	Integration with multiple sector data sources ongoing	Established	High	System ready; awaiting final approvals and full operational status
Uganda	Initiated	Digital cadastre system captures key data	Established	Medium	Early-stage digitization planning; data systems still manual
Zambia	Done	Operational but gaps in regional mineral flow data	Established	Medium	Operational but gaps in regional mineral flow data

3.3 Tool Analysis

The regional database remains non-operational, with development still underway and no routine data transmission from Member States. National implementation is highly uneven, with some countries lacking infrastructure or regulations to support data collection and exchange.

There is strong interest among Member States in improving the availability and quality of mining sector data at the national level. Regional focal point meetings initiated in 2024 have provided a valuable peer-learning space to support this ambition.

Critical gaps persist across the theory of change for the Tool overall: It remains unclear whether Member States will consistently submit data, whether the ICGLR Secretariat and Technical Unit have the capacity to analyse it, and which outputs will be used to inform policy and oversight.

Strengths

- **Clear technical design and institutional framework:** The ICGLR has developed detailed guidance for the structure and function of both national and regional databases, anchored in the second edition of the RCM Manual.
- **Integration with RCM data flows:** The database is conceptually well-aligned with the broader RCM architecture, including mine-site inspections, chain-of-custody tracking, and exporter certifications.
- **Potential for regional oversight:** If operationalised, the database could provide a unique platform for detecting irregularities in mineral production and trade across Member States.
- **Emergence of a peer-learning platform:** The meetings of national focal points on data, initiated in 2024, have created a valuable forum for technical exchange, experience sharing, and capacity support between Member States.

Weaknesses

- **The regional database is not yet operational:** Despite being formally mandated, the central database is still under development.
- **Highly uneven national implementation:** Some Member States have made progress in developing national databases, while others lack even basic digital infrastructure or legal frameworks to support data sharing.
- **Limited institutional capacity for data use:** Neither the Secretariat nor the Technical Unit currently has the analytical capacity or workflows to process, interpret, and publish insights based on database inputs.
- **Theory of change remains incomplete:** The core assumptions - that Member States will provide data, that it will be analysed at the regional level, and that findings will inform decision-making - have not been tested in practice.

Opportunities

- **Test the Regional Committee as a venue for data-driven discussion**, by presenting even partial datasets, or examples of anomalies based on publicly available datasets.
- **Mobilise support for capacity-building at Secretariat and TU level**, focused specifically on data analytics, visualization, and communication.

Threats

- **Low political will or fear of reputational risk may prevent Member States** from submitting data once the system becomes operational.
- **Lack of financial sustainability for database development and maintenance**, especially if partner support diminishes.
- **Failure to demonstrate utility**: If the system remains underused or disconnected from decision-making processes, Member States may disengage entirely.

Tool 4 - Formalisation of Artisanal and Small-Scale Mining (ASM)

4.1 Introduction

Tool 4 of the RINR focuses on the formalisation of the artisanal and small-scale mining (ASM) sector, which remains a significant source of employment and mineral production across ICGLR Member States. It aims to support Member States in transitioning ASM from informal to regulated activity through policy guidance, peer learning, and regional coordination. Tool 4 provides a shared platform for exchanging experiences, aligning policy approaches, and advancing the gradual integration of ASM into formal governance frameworks.

Theory of Change

The process begins with inputs and activities, including the development and implementation of national formalisation strategies for the ASM sector, the incorporation of gender-sensitive policies, and capacity building for both ASM miners and government agencies on health, safety, and environmental compliance.

These efforts are expected to produce outputs such as the establishment of a national formalisation strategy that provides regulatory guidance and institutional support, and improvements in transparency of ASM operations and mineral flows.

These foundational actions aim to deliver short-term outcomes, most notably greater transparency in ASM operations, including improved compliance with environmental standards and increased traceability of mineral flows from ASM sites to market. As formalisation takes root, the medium-term outcomes focus on enhanced livelihoods for ASM miners through better market access and fairer pricing, as well as a reduction in illegal mining, child labor, and related human rights violations.

Ultimately, the desired impact is a sustainable and well-regulated ASM sector that contributes meaningfully to national economies through increased formal production, taxation, and export revenues.

To track progress, the tool outlines ideal assessment metrics at each level. These indicators help assess whether formalisation strategies are improving ASM governance, reducing illegality, and ensuring safer and more equitable working conditions.

4.2 Regional implementation overview

The table below provides an overview of the progress made by ICGLR Member States in formalising their artisanal and small-scale mining (ASM) sectors, a key objective of the RINR.

Table 16: Tool 4 - Status per country

Country	Action Plan Status	Implementation Status	Relevance Assessment	Remarks
Angola	Illegal	Tool not being implemented, artisanal mining considered illegal	Not relevant	ASM formalisation not pursued under ICGLR framework
Burundi	In Progress	Fully operational	High	Active formalisation via cooperatives; ongoing awareness campaigns and capacity building
Central African Republic	In Progress	Advanced	High	Comprehensive permitting and inspection system
Rep. Congo	In progress	Ongoing (target 2026)	Medium	National ASM formalisation plan being aligned to regional RINR guidelines; initial steps ongoing
DRC	In Progress	Integrated into Mining Sector Plan (2022-2026)	High	Strong legislative framework supporting formalisation; implementation uneven due to scale
Kenya	In Progress	Ongoing	Medium	Formation of Artisanal Mining Committees underway; zoning and regulatory development in progress
Rwanda	In Progress	Fully operational since 2013	Very High	Cooperatives and companies fully integrated and trained
South Sudan	Early Stages (artisanal mining). In progress (small scale mining)	Ongoing	Very High	Institutional capacity constraints; delayed implementation but high political interest
Sudan	In Progress	Ongoing implementation	High	Implementation not possible due to civil war
Tanzania	In Progress	Well advanced; Minerals Market system operational since 2019	High	Regional leader in ASM formalisation; over 40 mineral markets established; regulatory framework in place but some legal/procedural finalisations pending
Uganda	In Progress	Ongoing	Very High	Strong legal and policy foundation; biometric registration and licensed ASM zones operational; digitization of data systems
Zambia	In Progress	Ongoing registration of miners	Medium	Incremental progress in formalising cooperatives

4.4 Tool Analysis

A SWOT framework was used to guide the assessment, helping to identify the strengths and weaknesses of the tool's implementation, as well as the external opportunities and threats that may influence its impact and future potential.

Strengths

- **ASM formalisation is a recognised national priority across the region.** Most Member States have made it central to their mining strategies and reform agendas, reflecting strong political will and alignment with broader sector goals. The importance of Tool 4 is consistently reaffirmed in ICGLR ministerial decisions.
- **National formalisation Strategies as a catalyst:** ICGLR guidance has led Member States to adopt national formalisation strategies. This demonstrates the influence of Tool 4 in aligning regional coordination with national policy reform, reinforcing its relevance and legitimacy across the region.
- **Peer learning as a driver of reform and implementation:** Tool 4 has facilitated meaningful peer exchange between Member States, allowing countries to learn from one another's best practices and challenges.

Weaknesses

- **Long theory of change limits direct influence on impact:** As a regional knowledge and coordination platform, the ICGLR plays an upstream role in supporting ASM formalisation but lacks the mandate and means to directly drive implementation. This distance from national enforcement and service delivery limits its ability to produce measurable results on the ground, especially in the short term.

Opportunities

- **Strong Member State engagement and recognition of ICGLR contributions:** The active participation of Member States in peer learning and their appreciation for ICGLR products—particularly the 2022 Gold Strategy—demonstrate strong ownership. This provides a solid foundation for developing additional guidance materials and practical tools to support ASM formalisation across the region.
- **Leverage practitioner-based peer learning for regional guidance:** While many regional and international institutions publish guidelines on ASM formalisation, the ICGLR has a unique advantage—its direct access to Member State practitioners actively engaged in implementation. This ongoing exchange of ground-level insights can be more systematically harnessed to develop practical, context-specific guidance and regional standards rooted in real-world experience.
- **harmonisation of export and tax regimes (Tool 2) as incentive for formalisation:** Coordinated reform of fiscal and export frameworks across borders can create tangible economic incentives for miners to enter the formal sector. Linking formalisation strategies with broader tax and trade harmonisation efforts offers a practical pathway to increase compliance.

Threats

- **Overextension beyond mandate or capacity:** Expectations placed on the ICGLR to drive national-level formalisation processes may exceed its regional coordination and knowledge-sharing mandate. This mismatch risks reputational damage if tangible national reforms do not follow.
- **Complexity of gold formalisation limits effectiveness of ICGLR interventions:** While Member States have shown strong demand for support in formalising the gold sector, the high-value, low-volume nature of gold makes it particularly vulnerable to smuggling and informal trade. This structural complexity poses significant barriers to traceability and regulatory enforcement - challenges that cannot be addressed solely through regional guidance or peer learning.

4.5 Summary findings

Tool 4 is strongly aligned with Member State priorities and has generated high levels of engagement, as evidenced by repeated ministerial endorsement, the integration of formalisation into national strategies, and the positive reception of ICGLR outputs like the 2022 Gold Strategy.

The ICGLR's core strength in regard to Tool 4 lies in peer learning and knowledge exchange, enabling practical cross-country insights and supporting the development of regionally grounded guidance.

However, its role remains upstream, with limited direct influence on implementation outcomes at the national level.

Expectations for ICGLR support in gold sector formalisation may exceed its operational mandate, particularly given the sector's inherent complexity and the structural challenges of formalising high-value, low-volume commodities like gold. Managing this mismatch will be key to preserving credibility and impact.

Tool 5 - EITI Peer Learning Mechanism

5.1 Introduction

The EITI Peer Learning Mechanism is integrated into the RINR to strengthen Member States' capacity to meet EITI standards. By facilitating the exchange of best practices and case studies, this tool aims to enhance transparency and revenue disclosure in the extractive sector, promotes cross-border collaboration, and fosters improved governance and accountability.

Theory of Change

The process begins with inputs and activities such as the sharing of best practices, case studies, and lessons learned by ICGLR Member States through peer-learning initiatives. These exchanges create opportunities for Member States to learn from each other's experiences in implementing EITI standards and improving transparency in the extractive sector.

These activities are expected to generate outputs including the production of regular, timely, and accurate EITI reports, and increased cross-border collaboration on transparency efforts between Member States.

These efforts aim to deliver short-term outcomes, such as improved capacity of Member States to comply with EITI standards, and increased disclosure and transparency in the reporting of revenues from the extractive sector. In the medium term, this peer-driven learning process supports stronger governance and accountability in managing extractive resources and reducing opportunities for corruption or mismanagement.

Ultimately, the desired impact is the development of more transparent and accountable extractive sectors, which contribute to sustainable development and improved economic performance in Member States through increased investment and greater public trust.

5.2 Regional implementation overview

The table below presents the status of ICGLR Member States in aligning with the Extractive Industries Transparency Initiative (EITI), a global standard for good governance in the extractives sector. It details each country's membership and reporting status, along with the relevance of EITI to their national context. The overview highlights progress toward transparency, accountability, and stakeholder engagement in natural resource governance.

Table 17: Tool 5 - Status table per country per tool

Country	Membership Status	Reporting Status	Remarks
Angola	Member (since 2022)	Reported (2024)	Recent member, advancing rapidly
Burundi	EITI Candidate	Reporting Pending	Establishing multi-stakeholder group
Central African Republic	Full Member (suspended 2024)	Report pending	EITI adapted to ASM; suspended for lack of contract disclosure and reporting delays
Rep. Congo	EITI Member (Country compliant since 2013)	Report validated (2022)	
DRC	EITI Member (Validated 2022)	Reported (2021)	
Kenya		-	No interest in joining EITI
Rwanda	EITI Candidate	Report Pending	Institutional setup in progress; accession targeted
South Sudan			Interest in joining expressed in 2012
Sudan	-	-	Interest in joining expressed
Tanzania	EITI Member (Validated 2023)	Reported (2022)	
Uganda	EITI Member (Validated 2024)	Reported (2023)	
Zambia	EITI Member (Validated 2021)	Reported (2020)	

5.3 Tool Analysis

A SWOT framework was used to guide the assessment, helping to identify the strengths and weaknesses of the tool's implementation, as well as the external opportunities and threats that may influence its impact and future potential.

Strengths

- **Strengthens peer exchange on extractive governance:** EITI peer learning fosters dialogue between ICGLR Member States on transparency and revenue management practices, helping to build a common vocabulary and shared norms.
- **Provides proximity support and institutional access:** The ICGLR has a unique advantage in its direct engagement with national governments and institutions, offering proximity support that the international EITI Secretariat cannot.

Weaknesses

- **Limited added value from ICGLR involvement:** The ICGLR's role in coordinating Tool 5 has been limited, particularly in recent years. While most Member States are part of EITI, no targeted efforts have been made to use it for regional analysis, missing an opportunity to enhance data integration and value.
- **Duplication and misalignment with ICGLR's comparative advantage:** As EITI already has its own structures for peer exchange and technical assistance, Tool 5 risks duplicating existing efforts while diverting attention from ICGLR specific tools where its added value is clearer (e.g. RCM or regional data coordination).

Opportunities

- **Leveraging EITI reports to strengthen ICGLR data systems and regional dialogue:** Despite limited coordination between EITI and RINR actors, structured, publicly available EITI data offers ICGLR an opportunity to enhance its own data efforts. These disclosures could support training for national and regional data systems under Tool 3 and enable more substantive, evidence-based discussions on revenue and production figures during Regional Committee meetings.
- **Alignment with national data system improvements:** Ongoing efforts in several Member States to improve mining sector data collection and establish national databases can support EITI mainstreaming.

Threats

- **Dilution of ICGLR efforts:** Maintaining a low-impact Tool 5 may undermine the overall RINR coherence and effectiveness, especially if the Secretariat's limited capacity is overstretched.

5.4 Summary findings

While most Member States have made significant progress in EITI implementation, this has largely taken place outside of the ICGLR framework, raising questions about the added value of Tool 5 in its current form.

Given the strong role of the international EITI Secretariat in facilitating peer learning and technical support, ICGLR-led efforts risk duplicating existing mechanisms and shifting attention away from areas where the ICGLR offers clearer added value—such as regional certification or data coordination.

Nonetheless, EITI reports remain a valuable, underutilised resource. Better integration of their structured data could strengthen the ICGLR's regional analysis and contribute to more evidence-based dialogue within platforms like the Regional Committee.

Tool 6 - Whistleblowing Mechanisms

6.1 Introduction

Tool 6 was established to strengthen accountability in the fight against the illegal exploitation of natural resources by improving national reporting systems and facilitating regional judicial cooperation. Its core objective is twofold: first, to ensure secure and accessible reporting channels at the national level that protect the anonymity of whistleblowers; and second, to enable coordinated follow-up on cases with cross-border implications through regional mechanisms. By bridging the gap between local reporting and regional enforcement, Tool 6 seeks to foster transparency, deterrence, and joint action against illicit mineral trade.

Theory of Change

The process begins with inputs and activities such as the establishment of secure and anonymous whistleblowing platforms and the training of law enforcement agencies to properly handle alerts and reports. These efforts aim to ensure that whistleblowing systems are both trusted and functional across ICGLR Member States.

These steps are expected to produce outputs such as increased reporting of illegal mining and related abuses, and improved information sharing and collaboration among Member States on cross-border enforcement actions based on whistleblower alerts.

These systems are designed to achieve short-term outcomes, including enhanced detection and monitoring of illegal mining and associated human rights violations, as well as improved judicial cooperation across borders. In the medium term, the mechanism supports stronger governance, compliance, and judicial coordination, helping to disrupt transnational networks involved in illegal resource exploitation.

Ultimately, the desired impact is a reduction in the financing of conflict through illegal mining, achieved through more effective cross-border legal collaboration, strengthened rule of law, and improved governance in the extractive sector.

6.2 Main findings

A SWOT framework was used to guide the assessment, helping to identify the strengths and weaknesses of the tool's implementation, as well as the external opportunities and threats that may influence its impact and future potential.

Strengths

- **Foundational intent to promote accountability and justice:** Tool 6 addresses critical gaps in accountability by aiming to protect whistleblowers and promote cooperation in the prosecution of illegal exploitation of natural resources.
- **Legal basis within ICGLR framework:** The ICGLR Protocol against the Illegal Exploitation of Natural Resources and supporting declarations provide a regional mandate for judicial cooperation and protection of informants.

Weaknesses

- **Fragmented and inconsistent national reporting systems:** Member States operate their own mechanisms for reporting illegal mineral exploitation and trade, but these vary widely in quality, accessibility, and responsiveness. The absence of common standards hampers the ability to compile reliable regional data.
- **Lack of operational mechanisms for investigation and coordination:** The originally envisioned Independent Mineral Chain Auditor (IMCA) has not been implemented, leaving a major vacuum in investigative capacity and independent oversight on a regional level.
- **Tool Title:** The title “Whistleblowing Mechanism” is misleading and too narrow, obscuring the tool's intended scope as a broader instrument for judicial cooperation, enforcement coordination, and the handling of serious legal violations across Member States.

Opportunities

- **Improve national-level reporting through ICGLR standards and guidance:** By developing and promoting minimum standards and technical guidance for national reporting systems - including provisions for confidentiality, follow-up procedures, and referral pathways—the ICGLR can support Member States in strengthening their mechanisms. This would enhance both accountability and coordination, contributing to more effective responses and data aggregation across the region.
- **Leverage the Great Lakes Judicial Cooperation Network for targeted coordination:** The existing Great Lakes Judicial Cooperation Network offers a promising platform to reinvigorate Tool 6 by fostering regional collaboration on mineral-related offenses. Specialised sessions or working groups could be convened under this framework to address cases of cross-border smuggling, fraud in certification, and other illicit mineral trade practices.

Threats

- **Fragmentation of law enforcement efforts:** Without a coordinating mechanism like the Independent Mineral Chain Auditor or a formal judicial cooperation framework, enforcement remains national and often inconsistent, enabling impunity and transboundary illegal trade.

6.4 Summary findings

Tool 6 was designed to strengthen national-level reporting mechanisms and ensure that investigations with cross-border implications receive coordinated regional follow-up. However, in practice, national systems remain fragmented and unstandardised, and the absence of an operational regional follow-up mechanism - such as the originally envisioned Independent Mineral Chain Auditor (IMCA) - prevents effective escalation and coordination of mineral-related cases with a regional dimension.

Structures like the Great Lakes Judicial Cooperation Network offer a foundation for revitalising Tool 6, including through targeted sessions on mineral-related offenses and the development of standardised national reporting systems.

SECTION 4

REVIEWING THE LAST DECADES' PROGRESS

This section reviews the evolution of the RINR over the past decade, highlighting its continued relevance, institutional strengths, and political value. It also examines persistent challenges - such as uneven implementation, limited strategic direction, and misalignment with Member States' evolving priorities - that have constrained its impact. The analysis sets the stage for tool-specific recommendations by outlining key tensions, opportunities, and reform orientations emerging across the region.



4.1 Introduction

Fifteen years after the signing of the Lusaka Declaration, the RINR remains a relevant and regionally owned framework. It continues to serve as a cornerstone for dialogue, peer learning, and cooperation on natural resource governance in the Great Lakes Region. Member States widely acknowledge the Initiative's standing. Through its multi-level governance structure, the RINR has enabled sustained co-operation by Member States and supported the development of shared instruments such as the RCM, and maintained a credible convening role. The ICGLR Technical Unit has become a trusted operational hub, with deep knowledge of Member States' institutional landscapes and experience in facilitating regional alignment.

4.2 Implementation trends

While no country has fully operationalised all six tools, notable progress has been made in building the institutional, legal, and technical foundations required for implementation. Member States have shown varying degrees of capacity and prioritization across tools, reflecting differences in mineral profiles, governance contexts, and reform cycles.

In assessing implementation progress, it is useful to distinguish between different levels of achievement along the RINR's theory of change - from foundational outputs, to intermediate outcomes, and broader impacts. While significant gaps remain, particularly in enforcement and regional coordination, the Initiative has contributed to important developments on all three levels. The following summary of these achievements reflect the practical value of the RINR as a platform for institutional strengthening, transparency, and long-term alignment around responsible resource governance:

Output Level – Systems and Structures Established

- Legal and institutional frameworks adopted for certification, ASM formalization, and legal harmonization.
- Traceability and reporting systems launched, including CoC schemes, national mineral databases, and EITI reports.
- Focal points and technical working groups designated across tools to support coordination and capacity building.

Outcome Level – Oversight and Practice Improvements

- Strengthened monitoring and control of mineral flows, particularly in ASM and 3T supply chains.
- Progressive alignment of national laws and regulations with ICGLR standards.
- Expanded transparency and accountability through formal reporting and data-driven oversight.

Impact Level – Regional Alignment

- Shared political commitment to responsible, conflict-free sourcing across the region.
- Emerging formalization of mineral economies, with improved regulation and potential for increased domestic revenue.

4.3 Structural weaknesses in the RINR framework

Despite these achievements on the different levels, a comparison with the RINR's intended outcomes and long-term impact reveals a persistent gap - particularly with regard to its core objective of reducing conflict financed through mineral revenues. During consultations, several Member States explicitly referenced the ongoing violence in Eastern DRC as evidence that the Initiative has not delivered impact on conflict dynamics. While the RINR has contributed to improved governance, oversight, and transparency in the mineral sector, it is not perceived as having curbed the role of mineral revenues in financing armed groups. As a result, its value is increasingly framed by Member States in terms of regulatory reform and institutional strengthening, rather than as a peacebuilding tool.

This impact gap reflects a deeper issue: while the initiative was a groundbreaking response to the "conflict minerals" agenda of the 2000s, its underlying theory of change has not kept pace with evolving concepts about conflict financing. Rooted in a powerful international narrative which links mineral exploitation to rebel financing, the RINR and its six Tools were designed to disrupt financial flows to armed groups through traceability and transparency mechanisms. This framing was reinforced by global advocacy campaigns and measures like Section 1502 of the U.S. Dodd-Frank Act.

Although mineral revenues still contribute to the financing of armed groups, today's understanding of conflict dynamics has evolved. The once-dominant narrative that illicit minerals are one principal motivation and enabler of armed conflict, this causality is now seen as overly reductive. Analysts have increasingly pointed to the multifaceted nature of conflict economies, where minerals are one among many sources of funding. The presence of armed actors is shaped not only by access to natural resources, but also by political grievances, territorial control strategies, and cross-border networks. This more nuanced understanding challenges the original theory of change underpinning the RINR and calls into question the effectiveness of the six tools as a peacebuilding tool.

At the same time, Member States' priorities have evolved. Issues such as domestic revenue mobilisation, trade facilitation, and value addition through have gained prominence as core development objectives. Yet these goals are not fully reflected in the RINR's current architecture. Despite broad recognition of these evolving priorities, there has been no structured discussion within the ICGLR on updating the six tools or introducing new ones to better align with Member States' needs.

An additional structural weakness has been the lack of robust accountability and follow-up mechanisms. There are no standard indicators to track implementation progress across tools, nor are there consistent reporting obligations tied to decisions taken at Ministerial or Summit level. Most decisions taken at these levels do not include timelines, assigned responsibilities, or follow-up mechanisms. The Regional Committee and Technical Unit have done their best to facilitate progress, but limited institutional memory and inconsistent resourcing hamper systematic tracking.

This lack of adaptation risks making the RINR increasingly detached from the realities on the ground. While the current configuration provides continuity and visibility, it constrains the ICGLR's ability to align with Member States' development agendas. This leaves the Secretariat and the Technical Unit to navigate competing expectations with limited flexibility.

4.4 Evolving regional and international context

Over the past decade, the mineral governance landscape in the Great Lakes Region has been shaped not only by internal dynamics but also by broader regional and international shifts. Several emerging trends are redefining how actors engage with natural resource governance, due diligence, and regional cooperation-offering both challenges and new opportunities for the future of the RINR.

One key trend is the growing confidence in the private sector capacities to implement mineral due diligence. Consultations pointed out that companies are often seen as better positioned than governments to trace supply chains, assess risk, and comply with evolving standards. In fragile or resource- constrained environments, private actors often have greater access to operational data, flexible systems, and stronger commercial incentives to ensure compliance. Proprietary company programs have often succeeded where public institutions face technical or financial limitations. This suggests a need to redefine the public sector's role - not as the main operator of traceability systems, but as a regulator, convener, and guarantor of legal coherence and grievance mechanisms.

In parallel, the broader discourse around conflict and natural resources is evolving. The emphasis has moved beyond the control of illicit mineral flows and the financing of armed groups to a wider agenda focused on transparency, regional prosperity, and value chain development. This shift is reflected in the U.S.-brokered DRC-Rwanda peace agreement, which sets the stage for a new Regional Economic Integration Framework. This framework explicitly aims to expand trade and investment based on critical mineral supply chains, block illicit flows, and ensure that natural resources contribute to shared prosperity through mutually beneficial partnerships. This reframing - from "conflict minerals" to "critical minerals for development" - opens new possibilities for the RINR to position itself within a forward-looking economic narrative.

At the same time, bilateral and trilateral industrial partnerships are gaining traction as countries seek to develop regional value chains and attract investment. Examples such as the Zambia-DRC Battery and Electric Vehicle Special Economic Zone show practical cooperation on processing, infrastructure, and export corridors, emerging outside traditional multilateral forums. Rather than being sidelined, the RINR can play a catalytic role—offering political legitimacy, technical expertise, and coordination. With experience in certification, ASM formalisation, and legal harmonisation, the ICGLR can help align such ventures with shared standards and inclusive development goals.

4.5 The future of the RINR

The analysis illustrates a core tension at the heart of the RINR today: its enduring relevance as a regionally owned initiative contrasts with its increasingly outdated architecture. Built around the early 2000s "conflict minerals" agenda, it has not kept pace with shifting national priorities or evolving governance trends. While mineral revenues continue to fuel conflict in parts of the region, today's political priorities have evolved and policy responses are more diverse - ranging from ASM formalisation and domestic revenue generation to regional value chain development and critical mineral strategies. The RINR's legitimacy and convening power remain important assets, particularly as new bilateral and trilateral cooperation models gain momentum. Yet, without a strategic shift, the RINR risks losing traction - functioning more as a static compliance framework than as a dynamic platform for coordination and reform.

Looking ahead, the RINR must reconcile its original conflict-prevention logic with the emerging development agenda. This will require a clearer strategic vision, targeted adjustments to its toolset, and mechanisms that reflect the political and economic realities of its Member States. The next section outlines recommendations to guide this transition and re-establish the RINR as a relevant and forward-looking framework.

Table 18: Summary of Section 4 on reviewing progress during the last 15 years

Theme	Findings	Strategic Considerations
# 1 Continued relevance, but need for strategic renewal	The RINR remains a valued, regionally anchored framework. Its original focus on conflict prevention remains fully valid, but Member State priorities have expanded toward trade facilitation, revenue generation, and economic diversification around the mining sector.	Without updates, the RINR risks becoming detached from evolving priorities like minerals trade facilitation and value addition.
#2 Strong convening role for the ICGLR	The RINR has proven effective in fostering dialogue, peer learning, and regional coherence. Its comparative strength lies in its convening power and ability to provide technical guidance and shared standards.	RINR's future could focus on convening, standard-setting, and enabling national reforms rather than operational delivery.
# 3 Uneven tool implementation	Some tools - especially the RCM and formalisation efforts - have seen notable progress. Others have advanced more slowly due to context-specific factors, such as diminishing relevance as institutional capacity.	Highlights the need for a review of the relevance and flexibility to adapt tools to country-specific contexts.
#4 Gaps in follow-up and progress tracking	Progress in the implementation of the 6 tools remains difficult to assess due to lack of agreement on objectives and indicators, and inconsistent follow-up on high-level commitments.	Progress is hard to measure or accelerate without stronger monitoring, evaluation, and reporting systems.
#5 Changing role of the private sector	In some contexts, private actors have taken a leading role in due diligence implementation, supported by commercial incentives and technical flexibility.	The ICGLR should consider redefining the role of government, particularly for the RCM - shifting away from implementation towards regulation, coordination, and legal oversight.

SECTION 5

GUIDELINES AND RECOMMENDATIONS FOR IMPLEMENTATION

This section synthesises the critical insights gained from the study into actionable recommendations and strategic guidance. It identifies key strengths, weaknesses, opportunities, and threats (SWOT) influencing effective implementation, outlines practical steps for refining each tool, and offers tailored recommendations for each ICGLR Member State. Additionally, it provides a structured approach to capacity building and technical support, emphasising collaboration, peer learning, and sustained regional cooperation.



Recommendations for strengthening the RINR Framework

5.1 Section introduction

Fifteen years after the adoption of the Lusaka Declaration, the RINR remains one of the most ambitious and politically anchored frameworks for natural resource governance in Africa. It has succeeded in creating a unique platform for Member States to coordinate policies, share experiences, and develop regional instruments, including the widely recognised RCM.

However, the findings of this assessment indicate that the RINR's impact remains constrained by systemic challenges - chief among them, a lack of strategic direction, uneven Member State engagement, and limited adaptability to evolving priorities. The six RINR tools have not been systematically reviewed or reformed since their adoption in 2010, despite significant shifts in national development strategies, and regional security dynamics. At the same time, issues such as value addition and mineral trade facilitation have emerged as new priorities that sit uneasily within the current RINR framework.

The recommendations presented in this chapter are entirely based on a detailed review of ICGLR documentation - including meeting reports, ministerial decisions, and technical strategies - combined with interviews with key stakeholders across Member States, the ICGLR Secretariat, and international partners. They aim to reflect both the institutional memory of the RINR and the evolving realities on the ground.

An initial set of recommendations was developed for earlier draft versions of this report and

presented for discussion and validation at the ICGLR Experts' Workshop held in Entebbe, Uganda, on 25–26 August, 2025. To preserve consensus and prioritise implementable actions, this chapter includes only those recommendations that achieved unanimous or near-unanimous support from participating Member State experts. Items that were not endorsed or that require further deliberation have been moved to Annex A: Recommendations Not Retained (For Further Discussion or Rejected). The annex groups proposals into two categories ("for further discussion" and "not retained"), records the main reasons provided by delegates, and - where applicable - notes conditions, evidence needs, or reformulations that could enable reconsideration at a later stage. This approach ensures transparency regarding the full range of proposals while keeping the main body focused on measures with the strongest immediate backing.

The recommendations in this chapter are structured into two sub-sections:

1. The first focuses on strengthening overall governance and implementation capacity for the RINR framework.
2. The second offers tool-specific recommendations aimed at reforming and repositioning the six original instruments.

Together, these recommendations offer a pathway for revitalising the RINR as a dynamic, responsive, and results-oriented regional initiative.

5.2 Strengthening RINR governance and implementation capacity

The RINR's governance structure was designed to ensure political ownership and sustained coordination across the Great Lakes Region. Yet, over time, gaps have emerged that limit its effectiveness and responsiveness.

While the initiative is rooted in a strong mandate, it lacks a clear strategic direction, mechanisms for regular review, and formats that encourage meaningful peer exchange. This section presents recommendations to reinforce the RINR's institutional backbone - by clarifying its objectives, adapting governance processes, and enabling the framework to evolve with Member State needs and emerging mineral priorities.

Table 19: Key Recommendations for the RINR

Recommendations	What it entails
RINR Recommendation #1: Develop a strategic framework for the RINR	Build consensus and adopt a clear overarching theory of change and set of measurable objectives for the RINR as a whole, outlining how the tools contribute to shared regional outcomes such as conflict prevention, improved governance, and economic inclusion. This framework should include provisions for monitoring and adaptation.
RINR Recommendation #2: Introduce a formal review and reform mechanism	Establish a structured process - e.g. a biennial Regional Committee review - to assess progress and recommend updates to the RINR tools, scope, and governance. This would institutionalise learning and allow the RINR to remain responsive to Member State priorities.
RINR Recommendation #3: Redesign the structure of Regional Committee meetings	Meetings of the Regional Committee currently do not allow for more focused, in-depth dialogue on priority issues. New meeting formats could include replacing general progress presentations with thematic peer exchange panels, roundtable problem-solving sessions, and a simplified monitoring dashboard submitted in advance. One session per year could be dedicated to strategic reflection on the RINR's relevance, reform needs, and alignment with Member State priorities. These changes would strengthen the Committee's role as a space for coordination, learning, and collective decision-making.

5.3 Reforming and repositioning the RINR Tools

The six tools of the RINR remain central to the initiative's operational framework, yet their current design and implementation reveal a number of limitations. Originally developed as a unified package in 2010, the tools have seen uneven uptake, diminishing relevance, and in some cases, a lack of clear purpose or evolution over time. As Member States' needs and policy priorities have shifted - particularly with the emergence of new commodities, institutional reforms, and national mineral strategies - the tools no longer fully align with the challenges on the ground.

Interviews with national stakeholders highlighted that some tools are perceived as outdated, underutilised, or overly narrow in scope. In several cases, the tools have functioned more as donor-facing compliance mechanisms than as instruments meaningfully integrated into domestic reform agendas. Repositioning the tools will be critical to revitalising Member State engagement and ensuring that the RINR continues to serve as a useful and relevant framework.

Table 20: Key Recommendations for Tool 1

Tool 1 : Regional Certification Mechanism (RCM)	
Recommendations	What it entails
Tool 1 Recommendation #1 Clarify the strategic purpose of the RCM moving forward	Facilitate a Member State dialogue on the future orientation of the RCM - acknowledging its limited impact on conflict but consolidating its role in improving national oversight of ASM. A realistic and shared objective will help re-align expectations and guide targeted reforms.
Tool 1 Recommendation #2 Enhance RCM compatibility with private sector due diligence systems	Review and update the RCM to improve its utility as a data and reference source for private sector due diligence schemes. This should include the development of standardised data interfaces and reporting formats that allow Member States to provide credible information relevant to internationally recognised due diligence processes, such as those under the RMI framework.

Table 21: Key Recommendations for Tool 2

Tool 2: Harmonisation of National Legislations	
Recommendations	
	The proposals related to Tool 2 did not reach consensus among Member States. They are therefore not retained in this section but are included in Annex A for reference.

Table 22: Key Recommendations for Tool 3

Tool 3: Regional Database on Mineral Flows (RDMF)	
Recommendations	What it entails
Tool 3 Recommendation #1: Clarify the purpose and expected outputs of the regional database:	Define the strategic objectives of the regional mineral database to ensure alignment with Member State priorities. Potential objectives could include anomaly detection, support for traceability and export oversight, or the generation of regional policy insights. Clearly outline the types of outputs the ICGLR Secretariat intends to produce - such as dashboards, trade bulletins, or country briefs - to demonstrate the value of consistent data submission and encourage sustained Member State participation.
Tool 3 Recommendation #2: Pilot cross-country trade data comparisons to identify anomalies:	Leverage publicly available trade datasets (e.g. UN Comtrade, national customs data) to conduct pilot comparisons between ICGLR Member States' declared mineral exports and recorded imports in destination countries. Such comparisons can highlight discrepancies indicative of smuggling or under-reporting. Use these findings to stimulate discussions within the Regional Committee, reinforcing its potential as a forum for reviewing red flags and fostering transparency.
Tool 3 Recommendation #3: Develop a long-term sustainability plan for the regional database:	Ensure the viability of the regional database by establishing a sustainability plan that covers hosting, maintenance, staffing, and software licensing. This plan should include realistic cost-sharing options among Member States and/or pooled donor support. Early planning for sustainability will enhance institutional credibility and reduce data gaps or system failure risks over time.

Table 23: Key Recommendations for Tool 4

Tool 4: Formalisation of Artisanal and Small-Scale Mining	
Recommendations	What it entails
Tool 4 Recommendation #1: Develop practitioner-informed regional guidance products	Develop operational guidance notes grounded in implementation realities. Systematically harness insights from Member State practitioners to produce practical guidance documents and regional standards. These should address shared implementation challenges - such as ASM site demarcation, permit issuance, and gold-specific traceability - and serve as living documents that evolve through continued peer learning and field feedback. Such resources would support consistency across countries while remaining responsive to local contexts.
Tool 4 Recommendation #2: Focus a Flagship Initiative on Women in ASM	Operationalise gender commitments through a flagship regional initiative on women in ASM. Launch a dedicated initiative focused on women in artisanal mining, building on existing references in ICGLR documents. The programme could include capacity building for women miners, support for women-led cooperatives, and promotion of gender-responsive licensing and regulatory frameworks, helping to close persistent gender gaps in the sector.
Tool 4 Recommendation #3: Establish a Regional Monitoring Mechanism for ASM Formalisation	Establish a lightweight monitoring mechanism to track formalisation progress. Design a simple, transparent system for Member States to self-report progress on their ASM formalisation strategies. The mechanism should facilitate benchmarking, identify implementation bottlenecks, and support mutual learning, without creating a punitive compliance structure. Regular reporting would help reinforce national accountability while fostering regional exchange.

Table 24: Key Recommendations for Tool 5

Tool 5: EITI Peer Learning	
Recommendations	What it entails
Tool 5 Recommendation #3: Use EITI data to strengthen regional analysis and inform ICGLR dialogue	The ICGLR should make greater use of structured, publicly available EITI data to enhance regional analysis and evidence-based dialogue. EITI reports offer valuable insights into revenue flows, production volumes, and sector governance that can enrich discussions within the Regional Committee. Integrating this data into ICGLR's own reporting and coordination efforts would strengthen regional transparency without creating additional reporting burdens for Member States.

Table 25: Key Recommendations for Tool 6

Tool 6: Whistleblowing Mechanism (WBM)	
Recommendations	What it entails
Tool 6 Recommendation #1: Strengthen national reporting mechanisms through ICGLR guidance	Develop technical guidance for national reporting systems on illegal mineral trade. Support Member States in strengthening accountability by providing standardised guidance for national reporting systems addressing illegal mineral exploitation and trade. This guidance should define minimum requirements for accessibility, confidentiality, follow-up procedures, and referral pathways. A consistent regional approach would enhance national response mechanisms while improving the quality and comparability of regional data.
Tool 6 Recommendation #2: Promote regional judicial cooperation through the Great Lakes Judicial Cooperation Network	Foster regional judicial cooperation through the Great Lakes Judicial Cooperation Network. Leverage the existing judicial cooperation platform to strengthen regional enforcement of mineral-related offenses. Specialised sessions could be convened to address cross-border smuggling, certification fraud, and other illicit trade practices. These efforts would help fill the gap left by the discontinued role of the Independent Mineral Chain Auditor and enhance inter-state coordination.
Tool 6 Recommendation #3: Clarify and expand Tool 6 by renaming it to reflect its judicial cooperation and enforcement coordination mandate	Reframe Tool 6 as "Judicial Coordination and Reporting" with a clearly defined scope. As part of Tool 6 reform, adopt a new name that reflects its expanded purpose beyond individual whistleblowing. The revised framework, titled "Judicial Coordination and Reporting", should clearly define institutional responsibilities, protocols for handling cross-border cases, and safeguards for informants and victims. A clarified mandate will improve both confidential reporting and judicial cooperation.

5.4 Expanding the scope to reflect evolving Member State priorities

While the RINR was originally designed to curb conflict financing through the mineral trade, many Member States have since articulated additional priorities - such as value addition, and improved cross-border trade coordination. These areas complement rather than replace the RINR's original objectives and reflect the evolving development agendas across the region. Importantly, they also hold potential to promote peace through economic cooperation, by fostering shared interests, regional integration, and more resilient livelihoods. Adapting the RINR to incorporate these dimensions could help sustain Member State engagement and enhance the initiative's relevance in the current context. The following recommendations outline possible steps in this direction.

Table 26: Key Recommendations for RINR scope

Recommendations	What it entails
Scope Recommendation #1: Explore opportunities for trade facilitation and economic cooperation to support peacebuilding goals	Present options for strengthening cross-border mineral trade as a peacebuilding tool. Develop and present to Member States a menu of policy options for enhancing cross-border coordination in mineral trade. These should explore opportunities such as improved trade infrastructure, simplified customs procedures, and mutual recognition of documentation to reduce smuggling and foster legal trade. Framing trade facilitation as a driver of peace and economic interdependence would broaden RINR's relevance and reinforce its alignment with Member States' development goals.
Scope Recommendation #2: Establish a dedicated cell within the Technical Unit to identify and support cross-border mineral sector cooperation projects that promote value addition and peaceful regional integration	Create a dedicated cell within the Technical Unit to support cross-border mineral cooperation initiatives. Several ICGLR Member States have made value addition in the mining sector a national priority. At the same time, regional cooperation in the form of cross-border projects has emerged as a promising avenue to build peace through trade and shared infrastructure. A dedicated cell within the Technical Unit could help operationalise these ambitions by identifying, supporting, and coordinating mineral sector cooperation initiatives with cross-border impact. This cell would: Map cross-border mineral flows and value addition potential; Identify regulatory, logistical, or financing gaps for cooperation projects; Facilitate technical assistance and partner matchmaking; and Help shape regional proposals that contribute to responsible sourcing, formalisation, and joint economic development. Examples such as the Lobito Corridor and the DRC-Zambia Battery Minerals Value Chain Project illustrate the potential of transboundary collaboration to promote regional integration, industrial development, and conflict-sensitive growth. This recommendation also draws on the Protocol on the Specific Reconstruction and Development Zone (SRDZ), which provides a legal basis for Transborder Development Basins as instruments for economic recovery and peacebuilding in the Great Lakes Region.
Scope Recommendation #3: Establish a structured framework for peer advisory support between Member States, with scope beyond ICGLR tools and supported by dedicated funding	Institutionalise a peer advisory mechanism to promote cross-country learning and reform. To promote practical cooperation and strengthen institutional capacities across the region, the ICGLR should build on impactful cross-border visits and establish a clearly defined mechanism for peer advisory services that extends beyond the implementation of the six RINR tools. This mechanism would allow Member States to receive tailored support from peers on a broad range of issues related to the management of the mining sector - such as legal and regulatory reform, institutional strengthening, ASM formalisation, or environmental compliance. A structured framework should: Define eligible thematic areas for support, including but not limited to RINR implementation; Set clear procedures for identifying needs, matching peer advisors, and structuring short-term advisory missions; Facilitate transparent selection and deployment of experts from within the region; and Be supported by dedicated funding, potentially mobilised through donor contributions or pooled financing. Institutionalising this form of horizontal support can help Member States learn from one another, accelerate reforms, and reinforce regional solidarity in addressing shared challenges.

SECTION 6

CONCLUDING REMARKS

This final section synthesises the key takeaways from the evaluation and outlines immediate priorities for reform, grounded in Member States' evolving needs and the region's shifting political and economic landscape.



Concluding remarks

Fifteen years after its adoption, the RINR remains a regionally unique and politically anchored initiative that has enabled uneven but steady progress in strengthening mineral sector governance across the Great Lakes Region. A majority of Member States has made notable advances in legal reform, ASM formalisation, certification readiness, and transparency, with the ICGLR platform serving as a shared framework for peer exchange and institutional learning.

At the same time, expectations surrounding the RINR have evolved. While the Initiative was originally conceived as a tool to disrupt the financing of armed groups through mineral exploitation, a majority of Member States now increasingly emphasise its value in supporting regulatory reform, formalisation, and broader economic mineral governance. Importantly, the expansion of state oversight and control over the mining sector is still widely viewed as a meaningful contribution to conflict prevention. This shift reflects both a more nuanced understanding of conflict dynamics and a pragmatic reassessment of what the RINR can realistically achieve in today's regional context.

While the foundations of the RINR remain relevant, there is growing consensus that the Initiative must become more dynamic and responsive to evolving needs. Discussions about reform, however, reveal varying degrees of ambition. Some Member States are cautious about modifying the existing framework, viewing the current tools as broadly sufficient if more consistently applied. At the same time, there is a shared expectation that all countries should demonstrate stronger political and technical engagement, and that implementation gaps must be addressed collectively to safeguard the credibility and future impact of the Initiative.

The way forward will require open dialogue on how the RINR can best serve today's priorities. This includes reassessing what should be preserved, what must evolve, and how implementation can be strengthened. With renewed political attention, the Initiative can continue to provide a common platform for responsible and coordinated mineral sector governance.

This report recommends that the ICGLR Secretariat:

- Immediately, review the evaluation findings, recommendations and draft options outlining possible paths forward for the RINR toolset. These options - for the underlying analysis - should be presented to Member States, followed by bilateral consultations ahead of the next Regional Committee meeting before the end of 2025. At that meeting, Member States could agree on a preferred strategic direction and validate a shared Theory of Change for the RINR.
- By mid-2026, coordinate working groups with national focal points to review, revise, and prioritise tool-specific reforms based on the agreed Theory of Change. This process should be supported by peer learning, targeted training, and the strengthening of focal point networks, including clearer roles and mandates for each tool.
- By the end of 2026, facilitate the formal adoption of revised tools and benchmarks during the Regional Committee meeting, and support their national-level rollout. A regional peer review mechanism should be launched to monitor progress, encourage coordination, and reinforce Member State accountability.



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