Realities of artisanal and small-scale copper and cobalt mining in Lualaba province, DRC

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Editorial

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Front cover image
Ore washing site at the Biwaya copper mine in the surroundings of Kolwezi.

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Initiative Bonne Gouvernance et Droits Humains (IBGDH) is an organization that works to promote good governance in the DRC's extractive sector and advocates for human rights and environmental protection. It defends the rights of local communities in the Lualaba mining region to strengthen their claims before the government and mining companies.

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Table of contents

Acronyms

2C	Copper and cobalt
ANR	National intelligence services (*Agence Nationale de Renseignements*)
ARECOMS	*Autorité de régulation et de contrôle des marchés des substances minérales stratégiques*
ASM	Artisanal and small-scale mining
BGR	German Federal Institute for Geosciences and Natural Resources (*Bundesanstalt für Geowissenschaften und Rohstoffe*)
CAMI	*Cadastre Minier*
CEEC	*Centre d'Expertise, d'Évaluation et de Certification des Substances Minérales Précieuses et Semi-Précieuses*
CMOC	China Molybdenum Company Limited
CNLFM	*Commission Nationale de Lutte contre la Fraude Minière*
CSO	Civil Society Organization
CTCPM	Cellule Technique de Coordination et de Planification Minière
DGM	Migration services (*Direction Générale de Migration*)
DRC	Democratic Republic of the Congo
EdT	Processing facility or crude refinery (*Entités de traitement*)
EGC	*Entreprise Générale du Cobalt*
EITI	Extractive Industries Transparency Initiative
ERG	Eurasian Resources Group
EU	European Union
FARDC	Congolese army (*Forces Armées de la RDC*)
FC	Congolese Franc
KCC	Kamoto Copper Company
MUMI	Mutanda Mining
PE	Exploitation Permit (*Permis d'exploitation*)
PEPM	Small-scale mining permit (*Permis d'Exploitation de Petite Mine*)
PMH	*Police des Mines et des Hydrocarbures*
PR	Exploration Permit (*Permis de recherche*)
UDPS	*Union pour la Démocratie et le Progrès Social*
UMHK	*Union Minière du Haut-Katanga*
UNAFEC	*Union Nationale des Fédéralistes du Congo*
SAEMAPE	*Service d'Assistance et d'Encadrement de l'Exploitation Minière Artisanale et à Petite Échelle*
SGN-C	*Service Géologique National du Congo*
TCC	Tengyuan Copper & Cobalt Resources
ZEA	Artisanal Mining Zones (*Zones d'Exploitation Artisanale*)

Introduction

Copper and cobalt (2C) are mined extensively in the Congolese Copperbelt, which stretches across the Democratic Republic of the Congo's (DRC) southeastern provinces of Lualaba and Haut-Katanga.[1] As both minerals are important for the energy transition and electrification,[2] most countries define them as strategic minerals. This leads to geopolitical competition to secure cobalt and copper supply from the DRC, since the country holds an estimated 50% of the world's cobalt reserves and accounted for approximately 75% of global cobalt extraction in 2024. For copper, the corresponding shares were 8% and 13%, respectively.[3]

Over the last two decades, Chinese companies have invested in joint ventures with Congolese state-owned enterprises, which enabled them to control most of the copper and cobalt production in the DRC. Former President Joseph Kabila signed a 9 billion USD resource-for-infrastructure deal with China in 2007, under which the joint-venture Sicomines was created. China's dominance in Katanga's mining industry reached a peak when China Molybdenum Company Limited (CMOC) acquired the renowned Tenke Fungurume mines in 2016. Fearing dependence on supplies from China, other power blocs, such as the EU and the US, have also started efforts to secure their own copper and cobalt supplies from the DRC. In late 2025, against the backdrop of the US-brokered peace deal between the DRC and Rwanda, the Trump administration signed the Strategic Partnership Agreement with the DRC to regain a foothold in the country's 2C sector.[4]

This global interest in the DRC's strategic minerals creates both opportunities and significant challenges for the Congolese government and its citizens, as copper and cobalt mining has historically played a central role in the DRC's national economy and continues to do so today.

The industrial exploitation of DRC's copper deposits already started in 1906 by the Belgian colonial mining company Union Minière du Haut-Katanga (UMHK) in the region that later became known as Katanga.[5] In 1967, President Mobutu Sese Seko transformed UMHK into the public company Gécamines. After its 2C production peaked in the 1980s, the company steadily declined from 1990 onwards because of financial embezzlement and clientelism.[6] Mobutu's successors tried to re-boost former Katanga's 2C industry through attractive joint venture deals between the moribund Gécamines and foreign private companies. As a result of these investments, copper exports have more than tripled over the past 10 years, from around 1 million tons in 2016 to 3.4 million tons in 2025. For cobalt export volumes, the same trend applies, from 69 thousand tons in 2016 to 199 thousand tons in 2024.[7] Consequently, copper and cobalt exports represented 90% of the country's total export value in 2023,[8] and copper exports alone already represented 38% of the DRC's GDP in 2024.[9]

Besides large-scale industrial exploitation, artisanal and small-scale mining (ASM) has also boomed over the past thirty years in southern DRC. In Lualaba province alone, hundreds of thousands of Congolese — recent estimated figures range from 140,000 to

1 In 2015, the province of Katanga was divided in the new provinces of Lualaba, Haut-Katanga, Haut-Lomami and Tanganyika.

2 The demand for cobalt has skyrocketed in recent years as it is an essential component of lithium batteries in electric vehicles, whereas copper is of crucial importance in the context of the wider global electrification revolution. (Source: Cobalt Institute, *Cobalt Market Report 2024,* May 2025, p. 5; Bazilian M. and Simon A.C., *Global copper demand outstrips supply, threatening electrification and industrial growth,* The Conversation, 19 March 2026.)

3 US Geological Survey, *Mineral commodities summaries: Cobalt,* February 2026; US Geological Survey, *Mineral commodities summaries: Copper,* February 2026.

4 IPIS, *Thorny issues risk jeopardizing the US-brokered peace deal between the DRC and Rwanda, but can regional economic integration offer solace?* IPIS Briefing, 19 February 2026.

5 Gérard-Libois J., *Katanga Secession,* The University of Wisconsin Press, 1966, p. 322.

6 Rubbers B., *L'Éffondrement de la Générale des Carrières et des Mines,* Cahiers d'Études Africaines, XLVI, 1, 2006, p. 117; Gulley A.L., *One hundred years of cobalt production in the Democratic Republic of the Congo,* Resources Policy, 79, p. 6.

7 CTCPM, *Statistiques Minières*, 2021 and 2025.

8 ITIE-RDC, *Rapport ITIE-RDC 2023*, December 2025, pp. 172-173.

9 World Bank Group, *DRC Economic Update - Reassessing Tax Incentives: Falling Short of Promised Growth and Equity,* July 2025.

more than 400,000[10] — work in the 2C ASM sector. In the 1990s, with the decline of the state-owned mining companies and the lack of foreign investment, ASM production gradually increased[11], and the government legalized it under the 2002 Mining Code. Yet, it is impossible to determine the share of artisanal production in the country's overall 2C export figures, as ASM and industrial production largely converge into a single supply chain. Nevertheless, in 2019, the German Federal Institute for Geosciences and Natural Resources (BGR) estimated that artisanal cobalt accounted for 15% of total Congolese cobalt exports,[12] but that share would have dropped below 10% by now,[13] mostly due to booming industrial production levels over the last decade.

While it is an important source of employment, the ASM sector is also marked by issues such as corruption, elite capture, lack of legal spaces to operate, conflicts between large-scale and artisanal miners, fraud, violent protests, and problematic labor conditions, which prevent local communities from reaping the full benefits of the sector. Additionally, these problems contribute to a negative perception of ASM that obscures its significant development potential.

To contribute to a better understanding of the 2C ASM sector and some of its main challenges, IPIS collaborated with the Kolwezi-based civil society organization (CSO) *Initiative de Bonne Gouvernance et Droits Humains* (IBGDH) and the provincial division of the Ministry of Mines' technical service, *Service d'Assistance et d'Encadrement de l'Exploitation Minière Artisanale et à Petite Échelle* (SAEMAPE) to map 51 ASM sites in the province of Lualaba. This study describes Lualaba's artisanal 2C sector, assesses its scale, provides an overview of the different supply chain actors and government oversight, and describes some of the main challenges to formalizing the sector.

The following section explains IPIS' methodology to map ASM sites and the geographic coverage of this study. Chapter 1 describes the artisanal production of 2C in the Lualaba province, the stakeholders involved, as well as some recent trends regarding production levels. Chapter 2 provides a description of 2C trade, including an overview of the different supply chain actors and their purchasing practices. Next, Chapter 3 discusses some key challenges that affect the artisanal mining sector, including limited government oversight, the interference of armed actors, the difficult coexistence with industrial miners, as well as the problematic labor conditions. Finally, the report provides some final conclusions and recommendations.

While this report provides an overall analysis of the data collected and main observations, the collected data can also be consulted on **IPIS interactive webmap of ASM sites**, which hosts information on more than 3,000 ASM sites in DRC. Additionally, the data can be consulted and downloaded via **IPIS' open-data page**.

10 OECD, *Interconnected supply chain: a comprehensive look at due diligence challenges and opportunities sourcing cobalt and copper from the Democratic Republic of the Congo,* 2019, p. 12; Bundesanstalt für Geowissenschaften und Rohstoffe (BGR), *Mapping of the artisanal copper-cobalt mining sector in the provinces of Haut-Katanga and Lualaba in the Democratic Republic of the Congo,* BGR, October 2019, p. 3; Baumann-Pauly estimated the number of artisanal miners at 200 000 in Lualaba alone (Baumann-Pauly D. (2023), op. cit., p. 9), whereas governor Fifi Masuka Saini asserted in 2024 there were more than 450 000 artisanal miners in Lualaba alone (Actualité.cd, *A ce jour, le Lualaba compte plus de 450 000 creuseurs artisanaux,* 22 November 2024).

11 Kalala K.F. and T. Mbiye, *Ressources naturelles, gouvernance et défies d'une croissance soutenue en RDC,* in L'Afrique des Grands Lacs. Annuaire 2008-2009, L'Harmattan, 2009, p. 147.

12 BGR (2019), op. cit., p. 4.

13 ITIE-RDC, *Rapport ITIE-RDC sur l'Exploitation Minière Artisanale et à Petite Échelle (EMAPE), filière Cuivre-Cobalt : Contribution à la mobilisation des ressources domestiques au travers de l'amélioration de la gouvernance de la filière artisanale cuivre-cobalt*, July 2025, p.30 ; BGR, *Artisanal and Small-scale Mining of Copper and Cobalt in 2025: Mapping of Artisanal Mine Sites in the Provinces of Haut-Katanga and Lualaba, DR Congo*, March 2026, pp. V and 3; the Cobalt Institute even assessed the share of artisanal production at no more than 2% (Source: Cobalt Institute (May 2025), op. cit., p. 34).

Methodology

For more than 15 years, IPIS has been mapping ASM sites in DRC, using a comprehensive questionnaire collecting detailed information at mining sites.[14] To ensure that the questionnaire was tailored to the specific context of Lualaba's 2C sector, it was revised during an interactive workshop with mining experts from IBGDH, BGR, Resource Matters, and technical staff from SAEMAPE. The customized questionnaire collects information on the geolocation of mining sites, the ownership, the legal status, accessibility, the extracted minerals, the number of workers, governance oversight, cooperatives, mineral prices, trade routes, and challenges related to labor conditions, security, and health and safety.

Field visits took place in April and May 2025, at the start of the dry season,[15] by mixed research teams, including one representative from civil society and one from SAEMAPE. In total, they visited 51 ASM sites in Lualaba province, of which 47 were active at the time of the visit (see figure 1). The research teams collected primary data through interviews with various mining stakeholders, including individual artisanal miners, mining cooperative representatives, traders, state agents, and CSOs. In total, the research teams interviewed 588 stakeholders.

The scope of the project did not allow for an exhaustive mapping of ASM sites all over Lualaba. The visited sites are located in the city of Kolwezi and its surroundings (19, including one inactive site) and the territories of Mutshatsha (20, including two inactive sites) and Lubudi (12, including one inactive site).

The research teams were able to access 45 of the 47 active ASM sites, even though obtaining access was not always straightforward. Where technical agents from the Ministry of Mines (e.g., SAEMAPE) were present, they often facilitated access to mining sites for IPIS research teams. Wherever these agents were absent, access proved to be more difficult. As such, the teams encountered access constraints at a few sites in Kakanda (Lubudi territory) and Kisanfu (Mutshatsha territory) due to restrictions and intimidation by the military, intelligence service agents, and security agents of cooperatives (also known as "agents mobiles").

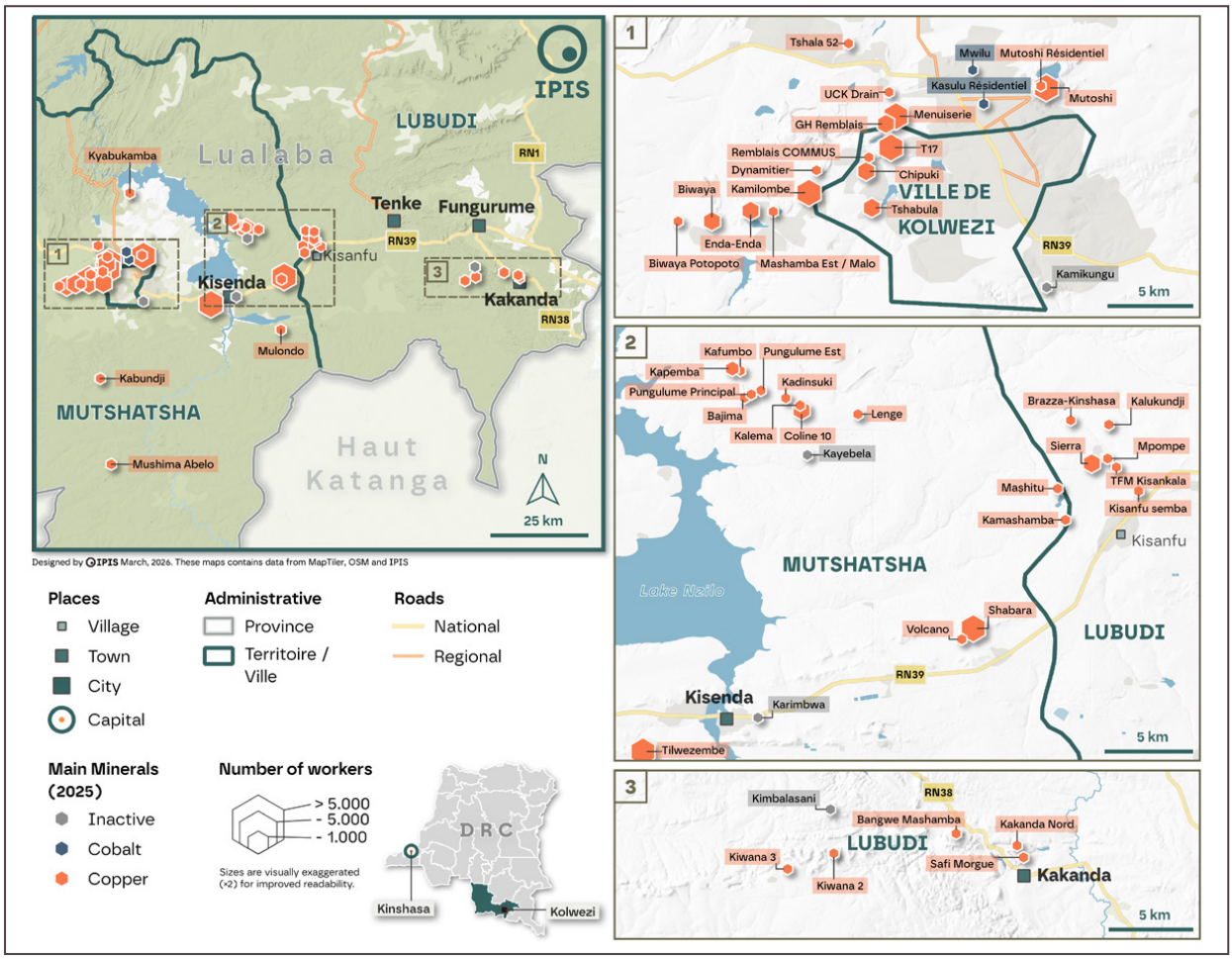
IPIS also coordinated its activities with the German Federal Institute for Geosciences and Natural Resources (BGR), which implemented a similar, complementary study in Lualaba and Haut-Katanga.[16]

◀ **Trucks parked in front of the Sierra copper mine, Lubudi territory.**

14 This information is available via IPIS' interactive webmap, IPIS' Open Data Dashboard, as well as IPIS' Open Data download page.

15 The rainy season runs from mid-September to mid-April, while the dry season from mid-April to mid-September.

16 BGR (March 2026), op. cit.



▲ **Figure 1: Artisanal copper and cobalt mining sites visited in the province of Lualaba (2025).**

1. Artisanal and small-scale production of copper and cobalt

Lualaba's ASM mineral supply chain starts at the mining sites, where several hundreds of thousands of ASM miners extract cobalt and copper. This chapter describes characteristics of the 2C ASM sector in Lualaba, whilst also focusing on global dynamics of ore prices and shifting balances between copper and cobalt productions, gender inequalities in the artisanal mining sector, and the ambiguous role of mining cooperatives which are supposed to represent the interests of artisanal miners.

1.1. The rise of artisanal and small-scale mining in a large-scale mining-dominated supply chain

1.1.1. Tolerated ASM: A legal framework yet to materialize in practice

Lualaba province is largely covered by industrial exploitation and research permits. ASM operations are not permitted here, as they must apply for their own specific licenses. Artisanal miners are supposed to work in Artisanal Mining Zones (*Zones d'Exploitation Artisanale*, ZEA), under the supervision of a mining cooperative (section 1.4 on mining cooperatives).[17] ZEAs must be developed in areas that are not suitable for industrial or semi-industrial exploitation,[18] and therefore cannot overlap with industrial titles.[19] Additionally, only adults with a Congolese nationality, who hold an official artisanal miner's card, are entitled to engage in artisanal mining.[20] Small-scale — or so-called semi-industrial — mining operations need to apply for a *Permis d'Exploitation de Petite Mine* (PEPM), and the Congolese legislation describes when an exploitation is to be considered small-scale or not.[21]

According to a report from the Extractive Industries Transparency Initiative (EITI), Lualaba province had 55 ZEAs in late 2024, but only two were being actively mined.[22] Instead, most artisanal miners work informally on industrial concessions or in residential areas. Our survey confirms this situation: only one of the visited artisanal mines lies partly within a ZEA,[23] while all the others are located in areas already conceded to industrial mining companies. Moreover, 11% of the active mines (5 out of 47) are located in residential areas, sometimes only a few dozen meters away from household residences.

To avoid social unrest, industrial titleholders often tolerate the presence of artisanal miners in their concessions (See section 3.2 'Coexistence with industrial mining companies'), and in most cases, these artisanal mining sites are supervised by SAEMAPE and the Mining Division, both of which are services of the national Ministry of Mines responsible for the technical support and administrative oversight of ASM. Besides these "tolerated" sites, authorities consider artisanal mining sites that operate without government oversight as "clandestine". In our survey, 6 mining sites (out of 47 active sites) were considered clandestine by SAEMAPE.[24] However, it is important to note that clandestine mining sites are underrepresented in our study, as many of these sites are difficult or impossible for research teams to access. These sites are often located within industrial concessions where artisanal mining is not tolerated by the title holder. For example, our survey does not include the artisanal mining sites located on the concession of the Tenke Fungurume Mine (owned by CMOC), where

17 Loi n°18/001 du 09 mars 2018 modifiant et complétant la Loi n° 007/2002 du 11 juillet 2002 portant Code minier, Article 1, points 10ter, 21 et 56, and article 109.

18 Loi n°18/001 du 09 mars 2018 modifiant et complétant la Loi n° 007/2002 du 11 juillet 2002 portant Code minier, Article 109.

19 Loi n°18/001 du 09 mars 2018 modifiant et complétant la Loi n° 007/2002 du 11 juillet 2002 portant Code minier, Article 30.

20 Loi n°18/001 du 09 mars 2018 modifiant et complétant la Loi n° 007/2002 du 11 juillet 2002 portant Code minier, Exposé des motifs.

21 A small-scale operation is characterized by an investment that varies between US$ 100.000 and US$ 2.000.000, the exploitation of the mineral deposit has a lifespan of less than 10 years, and the operations need a "certain level" of mechanization. (Source: Règlement Minier, Décret n°038/2003, tel que modifié et complété par le décret n° 18/024 du 8 juin 2018, article 204).

22 ITIE-RDC (July 2025), op. cit. p. 32.

23 Notably 'Kasulo'. However, the part of the mine where most activity is currently taking place, 'Kasulo Résidentiel', also falls outside of the ZEA.

24 Notably, GH Remblais, Tshabula, Kasulo Résidentiel, Mutoshi Résidentiel, Remblais Commus and T17. (Source: List of clandestine sites provided by SAEMAPE, March 2025.)

an estimated 3,000 to 10,000 artisanal miners are working. Many of these miners enter the concession clandestinely at night to extract ore.[25]

1.1.2. Estimated size of the ASM sector

The survey identified an estimated 109,107 artisanal miners across 47 active mining sites. The four largest mines, however, accounted for 61% of the total number of miners: Mutoshi (22,405), Kamilombe (18,000), Menuiserie (13,500), and Tilwezembe (13,000). As such, the median number of miners per site amounted to only 380. However, it is important to note that these figures reflect the situation at the time of the visit. The number of miners at artisanal mining sites can fluctuate considerably depending on factors such as seasonality, productivity, price fluctuations on the world market, accidents, management decisions, and (lack of) investments. (See text box) Many interviewees testified that there is a dire need for investments to drain pits and tunnels, and for their maintenance more generally, to guarantee steady production levels.

Local mineral production fluctuations

The mining site T17 (in Kolwezi) employs an estimated 6,000 miners, but production temporarily slowed down due to deadly accidents following the flooding of several galleries.

At the mining site Kabundji, exploitation was down as the cooperative COMIKAT was absent for the time being due to the death of its previous manager Louis Kiyombo ("*Louis 14*").

At Kayebela, the cooperative CMT chased all artisanal miners — with the help of the military — to make room for semi-industrial exploitation, while BGR still reported about 500 miners in 2019.

At several mining sites, production levels decreased during the rainy season. Tilwezembe, for example, employed an estimated 13,000 miners in April 2025, but production decreased for eight months in late 2025 at (a part of) the site due to floodings. Early February 2026, SAEMAPE reported, however, that eleven people lost their lives in a landslide as they illegally worked at night in the mine.[26]

A few years ago, declining trends were observed in the artisanal 2C sector. Both the EITI and BGR reported about decreasing artisanal production levels, especially in cobalt, due to the sharp fall in prices after the peak in 2018.[27] In 2021, BGR reported about "*stagnating numbers*" of ASM miners in Lualaba and Haut-Katanga.[28] In 2025, it seems that the artisanal sector has largely recovered. Our research documented a substantial rise in the number of miners at the sites visited by both IPIS in 2025 and BGR in 2019-2020. At the 32 mines visited both in 2019-2020 and 2025, an estimated 28,292 miners were working in 2019-2020, which increased to an estimated 59,688 five years later. (This comparison should, however, be interpreted with some caution, as the data have been compiled by two different research institutions, each with its own methodology.)

25 Rubbers B., *Mining boom, labour market segmentation and social inequality in the Congolese Copperbelt*, Development and Change, 51, 6, 2020, pp. 1572-1573; Triple R Alliance, *Tenke Fungurume Mining: Human Rights Due Diligence,* Summary Report, October 2023, p. 2.

26 Mines.cd, *11 morts dans un éboulement sur le site minier artisanal de Tulizembe*, 9 February 2026.

27 EITI, *Rapport ITIE sur le secteur de l'exploitation minière artisanale et à petite échelle dans la chaine de valeur du cuivre-cobalt-zinc*, March 2023, p. 28; BGR, *Mining Conditions and Trading Network in Artisanal Copper-Cobalt Supply Chains in the Democratic Republic of the Congo,* April 2021, p. 3.

28 BGR (April 2021), op. cit., p. 17.

This recovery has likely been driven by growing copper prices, with an average copper price increase of 42 % from the 2017–2020 period to the 2021–2023 period.[29] As mentioned above, in late 2024, the governor of Lualaba even claimed that the number of artisanal miners in the province might well be above 400,000.[30]

◀ **Artisanal miners active at the Tilwezembe site, Mutshatsha territory.**

1.1.3. Types of ASM exploitation and rising mechanization

Different forms of exploitation exist within the ASM sector, and multiple forms can coexist at a single mining site. Open-pit mining was observed at 53% of the sites in the survey (25 of 47 active mines visited), while underground mining occurred at 83% of the mines (39 of 47). At 43% of the mines (20), miners exploited the tailings (*remblais*) of (former) industrial mining sites. Notable examples of the latter include the Tshabula site on a concession of the Chinese company COMMUS and GH Remblais on a Gécamines concession, where 2,500 and 5,000 artisanal miners were observed, respectively.

◀ **Remblais COMMUS in Tshabula, in the surroundings of Kolwezi.**

29 Schütte P., Vetter S., Vasters J., and A. Ciabu, *Production and supply dynamics (2017–2023) associated with artisanal and small-scale mining of critical raw materials in Africa*, Resources Policy, 2025.

30 Copperbelt Katanga Mining, *Lualaba Governor Addresses Artisanal Mining in the Province*, 24 November 2024.

◄ **Artisanal miners awaiting an excavator to drop mineral waste on the 'remblais Kisankala' in Lubudi territory.**

Over the past decade, ASM in the DRC's copper-cobalt provinces of Lualaba and Haut-Katanga has become increasingly mechanized, with growing use of equipment such as crushers and excavators, largely driven by foreign investment.[31] As discussed above, in theory, semi-industrial mining operations need to apply for a PEPM.[32] Many small-scale operators, however, hide behind artisanal cooperatives. In our survey, semi-industrial exploitation occurred at about 40% of mining sites (19 out of 47).[33]

At several sites, the research teams observed how both forms of exploitation — both artisanal and semi-industrial — coexisted. In such cases, one *chantier* is being operated by *creuseurs* (or diggers) under the supervision of one mining cooperative, while the other *chantier* is controlled by another mining cooperative, which extracts minerals via semi-industrial production methods. Yet, in many cases, tensions have been reported between artisanal and semi-industrial operators (see section 1.4 'Mining cooperatives').

This mechanization appears to have accelerated in recent years, due to the vertical integration of mineral processing entities (see chapter 2 'Copper and cobalt trade'), the need to dig ever deeper in search of remaining mineral deposits, and the strong influence of political and military elites behind several artisanal mining cooperatives seeking quick profits (see section 1.4 'Mining cooperatives').[34]

1.2. Cobalt and copper: Fluctuating but interlinked productions

The main minerals extracted in Lualaba province are cobalt and copper, even though gold and cassiterite are also mined. Both metals commonly occur together in mixed copper-cobalt deposits in the Congolese Copperbelt, with varying concentrations from one site to another. Whether a site is considered a copper or cobalt site often depends on the metal content of the ore and on the metal for which the miners are paid. The metal content of the extracted ore is measured by mineral buyers, either at the buying house (*dépôt*), using a portable spectrometer, or at processing entities (*entités de traitement*). As a result, and often to the frustration of artisanal miners, there is no independent analysis of ore grades, even though they define the price paid for the mineral production.[35]

31 ITIE-RDC (July 2025), op. cit., p. 33.

32 A small-scale operation is characterized by an investment that varies between US$ 100,000 and US$ 2,000,000, the exploitation of the mineral deposit has a lifespan of less than 10 years, and the operations need a "certain level" of mechanization. (Source: Règlement Minier, Décret n°038/2003, tel que modifié et complété par le décret n° 18/024 du 8 juin 2018, article 204).

33 It is difficult to determine during a brief site visit whether a mining operation should be categorized as semi-industrial. We considered operations as semi-industrial when interviewees described them as such or when we observed the use of crushers or excavators.

34 ITIE-RDC (July 2025), op. cit., pp. 33-34, 233.

35 BGR (March 2026), op. cit., p. 24.

◄ **Semi-industrial mining operations managed by the cooperative Alfajiri and SCOMAPS at the TFM Kisankala copper mine.**

Following the decline in cobalt prices on the world market (see figure 2), most artisanal miners were digging for copper in the period around the visit. Consequently, copper was the primary mineral extracted at 45 of the 47 sites surveyed.

In February 2025, the Congolese authority responsible for supervising the market of strategic minerals (*Autorité de régulation et de contrôle des marchés des substances minérales stratégiques*, ARECOMS) suspended cobalt exports to tackle declining cobalt prices.[36] By implementing this measure, the government wanted to halt the steady decline in the price of cobalt since 2022, which was partly caused by an oversupply of cobalt (the industrial miner CMOC, for example, almost doubled its yearly cobalt production in 2024).[37] In October 2025, the government replaced the export ban with an export quota system, in an attempt to further maintain control over pricing.

The impact of the suspension of cobalt exports on the ASM sector seemed to be limited, as many artisanal miners had already shifted to copper over the past three years. However, the measure did succeed in raising the cobalt price by more than 150%, from around US$ 22,000 per ton in January-February 2025 to around US$ 56,300 in January 2026.[38]

Global copper prices, on the other hand, have been rising for some time and reached unprecedented levels in January 2026. According to the International Energy Agency, this remarkable increase is the result of recent short-term developments such as supply disruptions at several mines, build-up of substantial US copper inventories due to tariff uncertainty, and an expected rise in demand from the electrification and Artificial Intelligence sectors.[39]

As many ASM mining sites contain mixed copper-cobalt ores, miners can often continue working on the same site and shift to copper production. However, mining sites rich in cobalt saw miners move to copper sites. At the Mwilu mine (north of Kolwezi), for example, mineral production has halted, and only rubble and gravel mining now take place. Similarly, at Kamikungu, interviewees reported that the cooperatives Comikis and Comel ceased operations due to the fall in cobalt prices and the low copper grades at the site.

36 ARECOMS, *Suspension temporaire de l'exportation du cobalt de la République Démocratique du Congo*, Communiqué N° 2025/001, (22 February 2025); ARECOMS, *Mesures réglementaires urgentes relatives à la filière du Cobalt*, Communiqué N° 2025/002, (22 February 2025).

37 Center for Strategic & International Studies, *Stabilizing Cobalt Markets: A Price Floor for U.S. Minerals Security,* CSIS Briefs, 10 December 2025.

38 ITIE-RDC (July 2025), op. cit., p. 51.

39 Dhir, S., Nishiumi M. and T.-Y. Kim, *Copper prices have hit record highs, but smelters face mounting strategic pressures,* International Energy Agency Commentary, 2 March 2026.

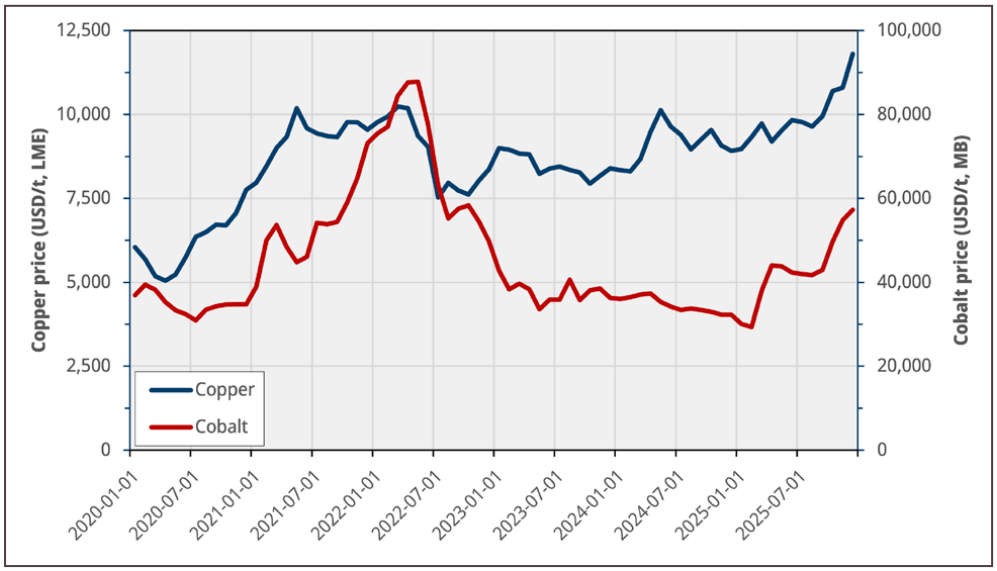


Figure 2: Cobalt-Copper price evolution (Reproduced from BGR, 2026).[40]

In contrast, at the time of IPIS' visits, cobalt was still being produced and purchased by certain mineral buying houses (*dépôts*) at Kamilombe and Dynamitier, which allegedly have stored it in anticipation of a price increase and the lifting of the ban on cobalt exports. Nevertheless, copper was being mined more extensively.

1.3. Women in mining: Key players facing deep-rooted discrimination

Mining activities provide important livelihood opportunities for both men and women worldwide. In the DRC as well, women play a vital role in the artisanal mining sector.[41] With estimated daily earnings ranging from US$ 2.15 to US$ 8.60, IMPACT calculated that artisanal (cobalt) mining is the highest-earning job for many women in the region.[42]

It is therefore striking that women account for only 2.6% of the mine workers at the mine level in our survey (2,840 women of a total of 109,107 miners). This low proportion is a direct consequence of discrimination and gender inequality (see below). At the same time, the figure conceals the real importance of women within the mineral supply chain, as this (low) number of women does not include all the women doing indirect jobs supporting the miners — such as food preparation, shopkeeping, and transport — and all the mining-related work that occurs outside the extraction point, such as cleaning and panning the minerals.

At the Menuiserie site, for example, women are not allowed to work inside the mine, but they wash and sort minerals at a river located a few hundred meters away. A similar situation exists at the Kafumbo site, where women wash the mineral production in the nearby river (of the same name), and where *commissionaires* (local mineral traders) purchase these minerals for further sale along the supply chain.

Women are often denied access to pits or the mining site altogether. Gender inequalities are rooted in the working conditions of the ASM sector, as well as social norms and taboos surrounding the presence and work of women.[43] At 22 sites (47% of active sites), it was specifically mentioned that customary rules prohibited women from entering the site. Thus, IPIS teams only observed women directly involved in mining activities at the mine level at 43% of the active mines (20 of 47 mines) (see figure 3).

In 85 % of the mines where women participate in mining (17 of 20 mines), they transport or process the mineral ores. Yet, women also dig for minerals themselves when they get access to the site (9 sites in our survey). Usually, women can only access those parts of the site where ores are extracted from

40 BGR (March 2026), op. cit., p. 2.

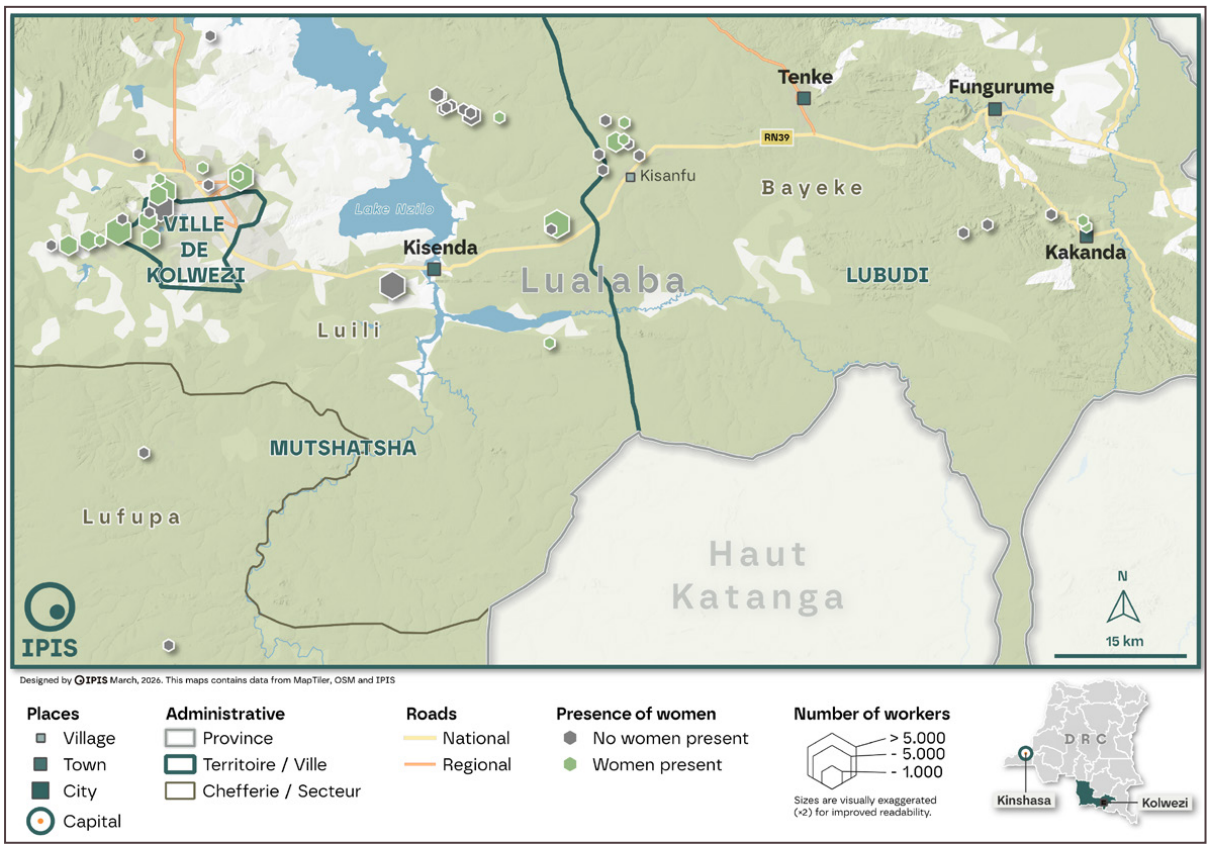
41 Bashwira N.M-R. and B.M. Akilimali, *Increasing Awareness of Policy Reforms on Gender Equality Issues in Artisanal and Small-scale Mining (ASM) in Eastern DRC: Case Study of the Numbi, Nzibira and Nyabibwe Sites*, IPIS, 2023.

42 IMPACT, *How Households Depend on Children's Income: The Case for Improving Women 's Livelihoods to Eliminate Child Labour in Democratic Republic of Congo's Cobalt Sector*, July 2023, p. 7.

43 IPIS, *Analysis of the interactive map of artisanal mining areas in eastern Democratic Republic of Congo (2023 update)*, December 2023, p. 9.

waste rocks ('remblais'). Consequently, 71% of the female miners in our survey worked on mining sites containing such remblais.

For example, in the Kisanfu area, the local chief prohibited women from entering the mines of Mashitu, Kamashamba, and Brazza-Kinshasa, while they can collect mineral ores at the waste rocks of Kalukundji, Mpompe, and Sierra. These waste rocks, however, only contain low-grade minerals, which are less remunerative. Women are thus only allowed to extract minerals where it is least profitable.



▲ **Figure 3: Presence of female workers on visited copper and cobalt artisanal mining sites in Lualaba province (2025).**

◄ **Women active on the Mulondo copper mining site in Mutshatsha territory.**

1.4. Mining cooperatives: Established to empower artisanal miners but subject to elite capture

Given that the artisanal mining sector faces problems such as informality, lack of transparency, poor labor conditions, and inadequate social protection, the government decided more than 15 years ago that artisanal mining operations must be organized through mining cooperatives.[44] Individual miners are therefore required to work within the framework of a mining cooperative, making these entities central players at the beginning of the mineral supply chain. In theory, mining cooperatives are set up by a group of artisanal miners to facilitate the coordination of mining activities, to distribute costs and revenues more fairly, and to benefit from certain collective advantages such as access to mining equipment. Additionally, cooperatives should empower miners, aiming to increase their bargaining position towards traders.[45]

1.4.1. A legal disposition aimed to protect miners, but that is subject to elite capture

However, in reality, mining cooperatives are not autonomous associations of artisanal miners united to advance their collective interests. Instead, most cooperatives are owned by individuals who employ artisanal miners.[46] As a result, miners are not permanent members of these cooperatives; they only join a cooperative's exploitation temporarily (e.g., for the duration of a specific mining operation) and leave once they find better opportunities elsewhere.[47] In the copper and cobalt sector in particular, cooperatives tend to be politicized as many of them are controlled by local leaders and political elites. These cooperatives often operate in a system of political patronage, representing not only the economic interests of their leaders, but also those of the political actors who act as their patrons. Consequently, local and even national politicians can exert a significant influence on the cooperative's operations: they can facilitate access to certain mines, they can have a say in the leadership of the cooperative, and they may interfere with the production of the mine.[48]

Mining cooperatives were present at 37 of 47 active mining sites. (See Annex: 'Mining cooperatives and groupements de creuseurs active on copper and cobalt ASM sites in the province of Lualaba'). In many cases, several cooperatives operate on the same mining site, each one managing its own exploitation. Most of these cooperatives are formally registered, while some others are informal groups of miners — who may or may not have submitted a registration application. Nevertheless, most registered cooperatives remain in a legally precarious position because they rarely operate in a formal Artisanal Mining Zone (ZEA), as required by the legislation.[49] Tshipuki (or 'Chipuki', in Kolwezi town), for example, is an artisanal mining site tolerated by the industrial mining titleholder CMT (Compagnie Minière de Tondo), in the Musonoie neighborhood in the center of Kolwezi. The company has fenced the part of the concession where it operates and left other parts to artisanal miners, although this is a residential area. The artisanal exploitation has three blocks (carrés), two of them (Tshipuki 2 and Tshipuki 3) are managed by the registered cooperative SCOOPS Madini ya Maendeleo (SCOOPS M.M.), while block 'Tshipuki 1' is managed by an informal group of miners.

44 Access to artisanal mining is restricted to adults who are Congolese nationals and members of an approved cooperative. (Loi n°18/001 du 09 mars 2018 modifiant et complétant la Loi n° 007/2002 du 11 juillet 2002 portant Code minier, Exposé des motifs).

45 Akilimali, J.B. and N.M. Mwana Biningo, *Extractivisme artisanal du cobalt et du cuivre et équité sociale en RD Congo: Points saillants entre enlisements et espérances au Haut-Katanga et au Lualaba,* Les Éditions de Pole Institute, August 2023, p. 39; De Haan, J. and S. Geenen, *Mining cooperatives in Eastern DRC: The interplay between historical power relations and formal institutions,* The Extractive Industries and Society, 3, 2016, p. 824.

46 Mwishamali Lukobo E., Geenen S. and Katz-Lavigne S., *Les coopératives : les portiers des sites miniers artisanaux au Lualaba,* IOB Working Paper 2025.07, April 2025.

47 EITI (March 2023) op. cit., pp. 46, 85 – 86; Akilimali J.B. and Mwana Biningo N.M. (August 2023), op.cit., pp. 45 & 76.

48 Mwishamali Lukobo E. et al. (2025), op. cit.; Actualité.cd, *Lualaba: La COMIBAKAT accusée d'entretenir la fraude minière et de bénéficier des exonérations des impôts et des taxes,* 31 October 2021; Afrewatch, *Le cobalt ne profite pas aux mineurs artisanaux de la RDC,* Mars 2024.

49 Loi n°18/001 du 09 mars 2018 modifiant et complétant la Loi n° 007/2002 du 11 juillet 2002 portant Code minier, Article 1.

◄ **Office of the cooperative SCOOPS M.M. that controls artisanal operations in the Tshipuki mine.**

1.4.2. Oversight on extraction and trade

Cooperatives organize and supervise the mineral extraction, but they also represent miners before state institutions. They seek financial and technical partners to invest in the site's exploitation, and they employ security agents (or so-called "*Mobiles du regroupement des creuseurs*") to monitor the security situation, but also to protect the interests of the cooperative.[50] In exchange for these services, mining cooperatives charge a fee ranging from 10 to 30% of the site's production to artisanal miners.

Cooperatives often organize the marketing of mineral production. They invite partners — often companies working with Chinese or Lebanese capital — to set up their buying houses (*dépôts*) at the site. These *dépôts* usually pay a fee to the cooperative to establish themselves at the site, as well as a fee for every batch of minerals that is transported from the site. At Tilwezembe, for example, COMIBAKAT, a cooperative that is linked to the current governor of the province,[51] reportedly charges 15% per truckload. These payments are certainly not always covered by supporting documents.[52]

1.4.3. Some social contributions

A certain level of appreciation has been reported for the services provided by some cooperatives at half of the sites where they are present (18 out of 36).[53] Interviewees acknowledged the proper organization of mineral extraction and noted that some cooperatives offered social support to miners, such as medical care in case of an accident.

At Biwaya (near Kolwezi), cooperatives[54] have built a school and a healthcare center in the miners' camp and drilled a water hole for the miners and their families. It is important to note that it is not just registered cooperatives that provide such services. At the Sierra mine (Kisanfu area), for example, appreciation was expressed for the miners' association, which was not registered as a cooperative (notably the *Regroupement des creuseurs de Kisankala*), for its investments and efforts to restart artisanal exploitation after the cooperative COMIBAKAT had left the site due to escalating costs for the semi-industrial operations that it had developed.

50 Mwishamali Lukobo E. et al. (2025), op. cit., p. 14.

51 Africa Intelligence, *Kazakh miner ERG clashes with presidential family in Lualaba,* 28 July 2023.

52 In chapter 2 ('Copper and cobalt trade'), we will discuss the role of the *dépôts* in the mineral supply chain more in detail.

53 For example, the cooperatives COMDK, COMEAK, CMDS and CMDCO/Espoir have been mentioned in this regard.

54 COOPEMIAK, COMIKO, COMIALU and CDMRK.

1.4.4. A burden on artisanal miners and some open conflicts

On the other hand, numerous complaints were also reported about cooperatives. At half of the mining sites, the role of cooperatives was perceived as a burden. These complaints included a lack of investments, the imposition of excessive fees, exploitative purchasing practices, and the expulsion of artisanal miners — either to the margins of the site or from the site altogether.

Many artisanal miners criticize cooperatives as they do not sufficiently protect them against exploitative purchasing practices from mineral buyers, or they even accuse cooperatives of facilitating these fraudulent practices (see chapter 2, on copper and cobalt trade). These complaints have also been raised at some of the bigger, well-known mines, such as Menuiserie (managed by COMIKIS) and Shabara (COMAKAT). At Colline 10, it is remarkable how interviewees appreciated COMPEA's local community investments but also complained about the way it organized the mineral trade. These observations corroborate similar findings from previous studies regarding the lack of transparency in trading activities.[55]

In some mines, there are outright conflicts between artisanal miners and the mining cooperatives. Most of these conflicts are about the cooperatives' collaborations with semi-industrial operators, which drive out the *creuseurs* from some parts of the mining site (see text box). As such, many interviewees perceive cooperatives as a springboard for semi-industrial mining with wealthy backers, instead of an organization representing the interests of artisanal miners.

Conflicts between artisanal miners and semi-industrial operators, supported by cooperatives

At the site Kiwana 2 (in Fungurume-Kakanda, in the territory of Lubudi) on a Boss Mining concession, a conflict broke out between artisanal miners and the cooperative COMIDEK, which is allegedly supported by members of the country's political elite. The cooperative recently wanted to make room for a semi-industrial operation, in collaboration with a Chinese partner (these semi-industrial activities ultimately never fully got off the ground and were suspended in early 2025). As COMIDEK's partner backfilled (*remblayage*) the artisanal pits, artisanal miners denounced that they were never compensated by the cooperative. Artisanal miners have resumed operations in the end, and the cooperative is struggling to restart its semi-industrial activity as it does not manage to relocate the artisanal miners. As the file was still under investigation by the Kakanda public prosecutor's office, artisanal miners continued to work in the mine, managed by an informal miners' association.

At Mulondo, artisanal miners have been evicted from the mine by COMPEA-SCOOPS, and can now only work on the tailings, where they struggle to produce decent volumes of mineral ores. Same story at the sites TFM Kisankala and Mpompe (or Pompi or Pompe). The Mpompe mine is located within the concession of Comide/Swanmines — subsidiaries of the mining company Eurasian Resources Group (ERG), but the latter can no longer access the site due to the influence peddling of some local strongmen. A local miners' association operated an artisanal exploitation but was dislodged by SOCOMAM — a cooperative reportedly supported by political elites — to make room for a semi-industrial exploitation. The conflict between the cooperative and the artisanal miners resulted in violent confrontations between miners and soldiers.

55 Mwishamali Lukobo E. et al. (2025), op. cit.

▲ **Remblais TFM Kisankala in Lubudi territory.**

At the Shabara mine, located on a concession of Mutanda Mining (a subsidiary of the Swiss company Glencore), artisanal miners also complained about mechanized exploitation for the benefit of the Chinese partner called 'Fally'.[56] According to Africa Intelligence, 'Fally' is part of the so-called "Chinese cartel", a group of Chinese operators that has strong connections with leaders of mining cooperatives and with buying houses.[57]

On the site of Kayebela, located on a Comide concession (ERG), the cooperative CMT chased artisanal miners to make room for semi-industrial exploitation, while BGR still reported about 500 miners in 2019.[58] In this mine too, 'Fally' has been identified as a partner of the cooperative in the semi-industrial operations. The military is present to keep miners out.

The mining cooperatives often call in the support of the military (including the Republican Guard) to protect their partners[59] — both semi-industrial operators and the *dépôts*. Such protection is provided in exchange for a payment to the soldiers.[60] (See section 3.5 'Interference of non-authorized state services')

Military backing (especially by the Republican Guard) seems to indicate that cooperatives and/or their (foreign) partners enjoy the support of politically influential people who have a stake in the ASM business.[61]

56 The growing mechanization of the exploitation at the Shabara mine and the involvement of Chinese and Lebanese mining operators was already reported in 2021 (Africa Intelligence, *Shabara: Ambiance délétère sur le site minier de Glencore,* 23 July 2021).

57 Africa Intelligence, *The Tshisekedi clan's dangerous ties with cobalt looting "cartels",* 6 October 2025.

58 IPIS, Interactive map of artisanal and small-scale mining exploitation in eastern DRC https://ipisresearch.be/mapping/webmapping/drcongo/v6

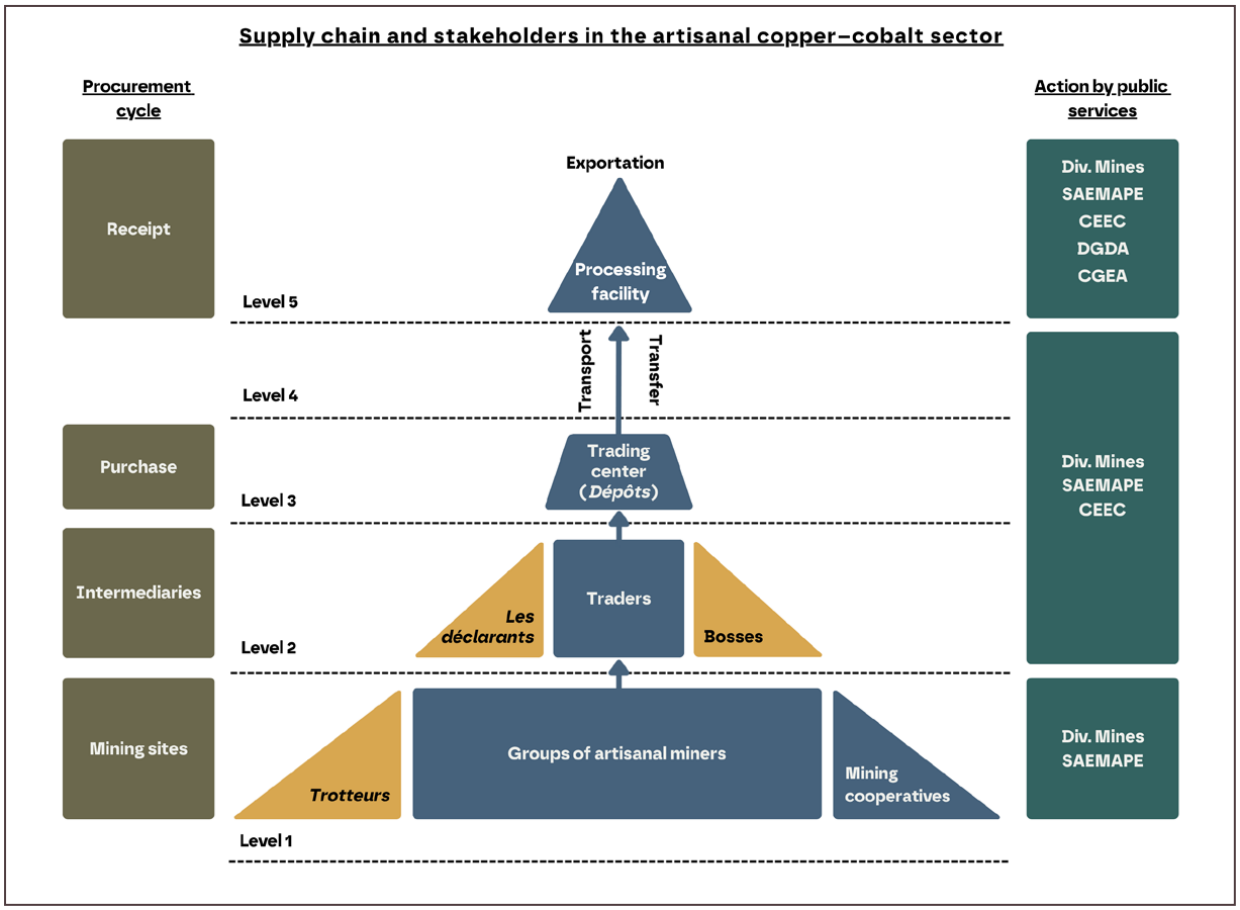
59 ITIE-RDC (July 2025), op. cit., p. 34 and 58; the Republican Guard is seconded to the President of the Republic and is responsible for his safety and that of his family.

60 This has been reported at many sites, including Kafumbo, Kapemba, Kimbalasani, Mashitu and Kayebela.

61 AfricaNews, *COMIKABAT roule pour l'État: Fifi Masuka se cache derrière*, 1 November 2021; IBGDH *Rapport d'enquête sur la contribution de l'entreprise Congo Dongfang International Mining au développement local de Kasulo*, November 2019; Africa Intelligence, *Ruée sue les remblais de la Gécamines dans la Gécamines dans la province du Lualaba,* 28 November 2024; Africa Intelligence (6 October 2025), op. cit.; Africa Mining Intelligence, *Artisanal mining regulator challenges Fifi Masuka's governorship*, 4 February 2026.

2. Copper and cobalt trade

After the extraction of the minerals, various types of traders intervene along the supply chain. Congolese legislation stipulates that *négociants* (local mineral traders) are mandated to buy minerals at the mine and deliver them to processing facilities (*entités de traitement*, EdT) (see figure 4). These facilities process the minerals into higher-valued products,[62] and they are the ones authorized to export the minerals. Local mineral traders (*négociants*) store minerals until sufficient volume is accumulated to load a truck (up to 40 tons) for delivery to the processing facilities. As a result, numerous *dépôts* (warehouses) exist on mining sites and in villages, and urban neighborhoods adjacent to mining sites.



▲ **Figure 4: Supply chain and stakeholders in the artisanal copper and cobalt sector, in Lualaba province (Reproduced from EITI report, 2023).**[63] [64]

In 2025, SAEMAPE identified 385 *dépôts* in the province Lualaba.[65] *Dépôts* are present at 49 % of the active mines included in this survey (23 of 47). In most cases, these *dépôts* pay a fee to the provincial authorities and the cooperative allowing them to operate on the site, as well as a fee for each batch of minerals transported from the site to the processing facilities. In return, cooperatives at times even grant *dépôts*

62 OECD (2019), op. cit., p. 28-30.

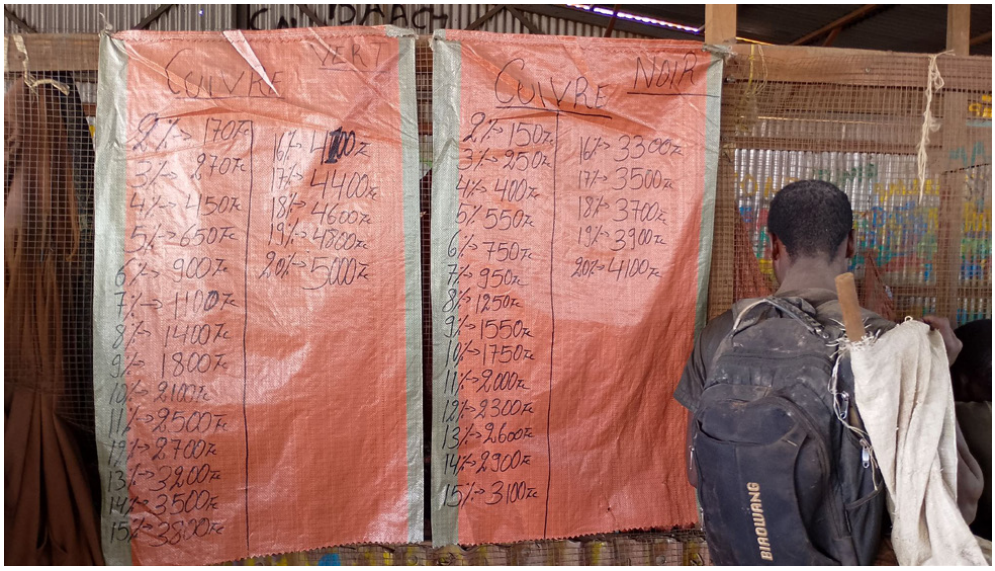
63 EITI (March 2023) op. cit., p. 36

64 The DGDA (*Direction Générale des Douanes et Accises*) is the DRC's customs agency controlling and taxing the export of minerals; the CGEA (*Commissariat Général à l'Energie Atomique*) is responsible for monitoring the potential radioactivity of minerals.

65 SAEMAPE internal report, 13 March 2025.

a monopsony, which often contributes to artisanal miners' frustrations over the unfavorable purchasing practices enforced by mineral buyers.[66]

At other sites, artisanal miners are free to sell to the mineral buyer of their choice (*négociants* and their intermediaries, or so-called *commissionaires*), although the cooperative still receives a share of the production. These traders typically take the minerals they purchase to *dépôts* located at neighboring mining sites or operating in nearby agglomerations. Hence, *dépôts* at larger sites such as Kamilombe and Menuiserie also purchase production from smaller sites in their vicinity such as Mashamba est/Malo or Enda Enda.



◄ **Price list for different types of copper ore at a trading center (*dépôt*) Tilwezembe, Mutshatsha territory.**

◄ **Trading center (*dépôt*) in Kamilombe.**

Congolese mining legislation reserves the artisanal sector for Congolese nationals in order to promote the emergence of a Congolese middle class.[67] Only Congolese citizens can be officially recognized as artisanal miners and négociants.[68] However, opportunities for socioeconomic progress within the copper and cobalt mineral trade are undermined by the vertical integration of foreign capital (foreign companies investing in local business operations to gain full control of their supply chain), as *dépôts* operate

66 See also Mwishamali Lukobo E. et al. (2025), op. cit.

67 Pact, *PROMINES Study: Artisanal Mining in the Democratic Republic of Congo*, June 2010, p. 37.

68 Loi n°18/001 du 09 mars 2018 modifiant et complétant la Loi n° 007/2002 du 11 juillet 2002 portant Code minier, Article 1, termes 19bis et 33.

in practice as buying houses whose real owners are usually foreign investors operating through local front men.[69] This situation largely results from the dependence of local traders on (pre-) financing from foreign investors, leaving the 2C trade predominantly in the hands of Lebanese and, especially, Chinese trading networks. Even some cooperatives are subjected to the control of traders who pre-finance their mining activities.[70] (See example in text box.)

◄ **Trading center (*dépôt*) in Kamilombe.**

Lebanese trading network's monopoly on artisanal production

At Kalukundji, a mining site located within the concessions of one of ERG's subsidiaries, a *dépôt* linked to the trading network of Lebanese businessmen has established a de facto trade monopsony. Although mining activities at Kalukundji were exclusively artisanal in nature at the time of the surveyors' visit, according to the concession holder, the cooperative COMIBAKAT had until recently been involved in semi-industrial operations in collaboration with members of the Lebanese network. With the backing of individuals from the country's political elite — who, according to some sources, are pulling the strings behind the scenes — they have deployed military protection, enabling them to block any access and oversight by official state services.[71]

Additionally, the *dépôts* are frequently associated with anti-competitive and exploitative purchasing practices. It includes tampering with the scales to cut back on weight, a lack of transparency on the grade of their mineral ores, and monopsonies that push down prices, weakening miners' bargaining position. Miners also complain that they are only paid for the main mineral, even though most sites produce mixed copper-cobalt ores. Following the suspension of cobalt exports, the value of mineral ores has generally been calculated based on copper content, ignoring the cobalt they contain. In Kisanfu Semba, for example, miners explained that the site officially produces copper ore, but it also contains cobalt concentrations

69 ITIE-RDC (July 2025), op. cit., p. 191.

70 Akilimali J.B. and Mwana Biningo N.M. (August 2023), op. cit., p.38; EITI (March 2023) op. cit., p. 46.

71 See also Africa Intelligence (6 October 2025), op. cit.; Africa Intelligence, *Tshisekedi clan involved in former Katanga province's mining wild west*, 5 February 2024; Africa Intelligence (28 July 2023), op. cit.

of around 2%, for which they are not compensated. They believed that these profits are entirely captured by the traders and processing facilities. These observations corroborate findings of previous studies, indicating that spectrometers and scales are manipulated by many buyers, and that miners are often forced by the cooperative to sell the extracted ore to (Chinese) buyers who operate in partnership with the cooperative, and impose the weight, metal content, and price.[72]

▲ **(both pictures): Spectrometer used to measure the metal content of the extracted ore.**

▲ **Scale used in the Tilwizembe trading center/*dépot*.**

To counter these exploitative practices, the Mining Regulation encourages provincial governors to establish official Centres de négoce, trading centers supervised by state agents.[73] In 2023, a Centre de négoce was established in Musompo, near Kolwezi, to formalize trade and counter opaque transactions occurring in *dépôts* and processing facilities — concerning weight, mineral content, and other complaints related to pricing and taxation.[74] The mining state service Centre d'Expertise, d'Evaluation et de Certification des Substances Minérales Précieuses et Semi-Précieuses (CEEC) set up a laboratory in Musompo to assess the actual quality of mineral ores, for more transparent price setting.[75] To date, however, Musompo has had no impact and is not operational, despite having been officially inaugurated. Indeed, the hundreds of privately held trading centers (*dépôts*) located throughout the mining sites, continue to attract the majority of mineral production.[76]

The Congolese mining legislation prohibits the exportation of raw copper and cobalt ore.[77] Rudimentary processing of copper and cobalt ore takes place at the artisanal mining sites and includes crushing, washing, separation and screening. As mentioned before, the metal content of these concentrates is determined by a portable spectrometer in *dépôts*. These *dépôts* sell the concentrates to processing facilities, or crude refineries (EdT, *entités de traitement*), where it is chemically processed into cobalt hydroxide and copper cathode, the final products of the domestic Congolese supply chain.[78] According to SAEMAPE records, there were 11 *entités de traitement* in Lualaba province in 2025.[79]

72 BGR (April 2021), op. cit., p. 40; Mwishamali Lukobo E. et al. (2025), op. cit.

73 Règlement Minier, articles 25 and 233; EITI (March 2023) op. cit., p. 74.

74 Ministère des Mines, *Inauguration du Centre de Négoce de Musompo par Félix Tshisekedi. La Ministre des Mines, Antoinette N'Samba Kalambayi a salué la concrétisation de la vision du chef de l'état qui avait vu juste en son temps,* 6 October 2023.

75 ITIE-RDC (July 2025), op. cit., pp. 42, and 102.

76 EITI (March 2023) op. cit., p. 75.

77 Arrêté interministériel n° 945/CAB.MIN/MINES/01/2015 et n° 329/CAB.MIN/FINANCES/2015 du 31 décembre 2015 modifiant l'Arrêté interministériel n° 0122/CAB.MIN/MINES/01/2013 et n° 782/CAB.MIN/FINANCES/2013 du 05 avril 2013 portant règlementation des exportations des produits miniers marchands.

78 BGR (2019), op. cit., p. 26-32.

79 SAEMAPE internal report, 13 March 2025.

◄
Ore washing by the canal that runs through the Biwaya neighborhood in a residential area near Kolwezi.

◄
Ore washing at the Mashamba est/Malo mine.

Often, the processing facilities (EdTs) process ore from both artisanal and industrial sources. Therefore, artisanal minerals enter industrial supply chains and "the value chain of the artisanal copper-cobalt sector ends at the gates of the processing facilities".[80] Most EdTs hold industrial mining permits, allowing them to rely on a hybrid supply of artisanal and industrial production. An EITI report, however, questions the legality of this practice, asking whether key actors in the artisanal supply chain (notably the EdTs) are legally permitted to operate within the industrial sector.[81] Additionally, some of the processing facilities are owned by larger mining companies, with the purpose of processing the ore extracted from the group's various mining sites, and some of them also purchase ASM materials from outside their own assets, for example from the *dépôts*.[82] Therefore, no disaggregated data are available on copper and cobalt exports coming from artisanal production. A recent EITI report estimated that artisanal cobalt production accounted for less than 10% of DRC's total export volume,[83] while BGR estimated in 2026 the contribution of artisanal miners to copper and cobalt production at approximately 9% and 5%, respectively.[84]

80 EITI (March 2023), op. cit., p. 91.

81 For example, Thomas Mining holds PE13831, PE15596 and PE15597, and CCR holds PE14050. (Source: ITIE-RDC (July 2025), op. cit., pp. 33 and 55.)

82 EITI (March 2023), op. cit., p. 91; OECD (2019), op. cit., pp. 20 and 26.

83 ITIE-RDC (July 2025), op. cit., p.30.

84 BGR (March 2026), op. cit, p. V and 3. According to the Cobalt Institute, by the end of 2024, ASM's cobalt production had fallen to a very low level, accounting for just 1.3% of the DRC's cobalt supply (see Cobalt Institute, *Cobalt Market Report 2025,* May 2026).

3. Challenges in artisanal copper and cobalt mining

Limited government oversight and the many informal practices in the ASM sector pose numerous challenges. It is for example difficult to organize a peaceful and legal coexistence with industrial mining. In addition, the unclear legal status of many artisanal miners makes it hard for them to claim their rights and exposes them to various risks, including exploitative behavior by state security forces, traders and cooperatives, as well as bad labor conditions. In the following sections, we discuss some key challenges for artisanal mining stakeholders.

3.1. Limited state oversight and traceability

The DRC has relevant legislation in place, and different mining state services with clear mandates, to govern the artisanal mining sector. SAEMAPE, the Mining Division and the Mining Police (PMH, *Police des Mines et des Hydrocarbures*) are the ones closest to the actual artisanal extraction. While SAEMAPE is mandated to provide technical support to artisanal miners, the Mining Division oversees mining activities in the province. The latter also receives applications for the formal registration of mining cooperatives and provides its advice to the provincial minister.

The PMH is a police service to maintain order at mining sites and prevent illegal activity in the mining sector.[85] Additionally, there is a range of other mining services, including the *Centre d'Expertise, d'Évaluation et de Certification des Substances Minérales Précieuses et Semi-Précieuses* (CEEC) which analyzes, evaluates, and certifies minerals before export, the *Cellule Technique de Coordination et de Planification Minière* (CTCPM), which disseminates information about the mining sector, such as production and export statistics, the *Cadastre Minier* (CAMI) overseeing the allocation, registration, and management of mining titles, and the *Service Géologique National du Congo* (SGN-C).[86]

In this survey, SAEMAPE and the Mining Division were present at 68% of active sites (32 out of 47). However, in 48% of these cases (14 mines), their presence is not permanent, and they only pass by when minerals are loaded onto vehicles, primarily to issue the necessary documentation to traders. When they are permanently present, they can provide more services, including technical support and oversight of labor conditions, as well as compliance with health, safety, and environmental norms.

◀ **Mining pit in Kamilombe protected by a timber-framed structure.**

85 PNC, *Vademecum de la Police des Mines - Edition 2020.*

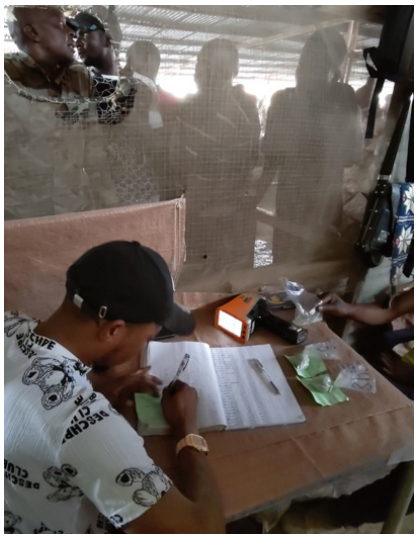
86 IPIS, *Diamonds in the DRC: A sector struggling to shine again*, April 2025, p. 17.

◄ **Loading of several tons of ore onto a truck at the Mashamba est/Malo site near Kolwezi.**

On the other hand, several reports criticize state services for not fulfilling — or not being able to fulfil — their responsibilities. First, state agents of the Ministry of Mines do not manage to protect artisanal miners against fraudulent and exploitative practices (e.g., the tampering of measurement tools to define the quality, weight and grade) and to promote more transparent price setting.[87]

Additionally, state mining services struggle to monitor artisanal copper and cobalt trade, even though the government has developed a chain of custody documentation system,[88] outlined in the Ministries of Mines and Finance's 'Manual on traceability procedures'.[89]

Due to their limited presence on the sites and at the trading hubs, state agents often depend on information, such as the origin and the volume, reported by *dépôts* and processing facilities. The *dépôts* are often surrounded by many mining sites and are therefore able to attribute any "origin" they choose to different batches of minerals, which clearly undermines traceability. Cooperatives are often also complicit in this practice, as they receive minerals from different sources and present them as originating from their members, even when this may not reflect their actual source. EITI even claimed a lack of willingness of government agencies to ensure full transparency regarding mineral trade and financial transactions within the copper and cobalt mineral supply chain.[90] In addition, the blending of minerals from industrial and artisanal origin, as well as from different *dépôts*, at the level of the processing facilities (as described earlier in chapter 2) further undermines traceability and transparency.



◄ **Employee of a *dépot* holding the registry.**

87 Akilimali J.B. and Mwana Biningo N.M. (August 2023), op. cit., pp. 77-78.

88 At the mining site level, the origin of minerals is recorded in the following documents: *Bordereau de constat a*nd transport certificates (or '*Attestation de* transport') are issued by the Mining Division, and SAEMAPE delivers a purchase order ('*Bon d'achat*'). Additionally, loading and unloading reports (*procès-verbaux de chargements et déchargements*, called *PVCD,)* are issued by inspectors from both departments. At the level of the *Centre de Négoce*, or the *dépôts*, different Mining state services issue documents to record mineral sales and transport (See for example: EITI (March 2023) op. cit., pp. 75-78.).

89 Ministère des Mines et Ministère des Finances, *Manuel des procédures de traçabilité des produits miniers : De l'extraction à l'exportation - 2ème Edition*, April 2014.

90 EITI (March 2023) op. cit., p. 49.

3.2. Coexistence with industrial mining companies

The Congolese legislation stipulates that artisanal miners are supposed to work in Artisanal Mining Zones (ZEA) and small-scale miners in a PEPM (*Permis d'Exploitation de Petite Mine*). (See section 1.1.1 'Tolerated ASM: A legal framework yet to materialize in practice') Due to a lack of (viable) ZEAs, many artisanal miners however operate informally on concessions which have already been conceded to industrial actors (*Permis d'exploitation* (PE) or *Permis de recherche* (PR)), or in residential areas. In this survey only one of the artisanal mining sites lies partly within a ZEA,[91] while all the others are located in areas already conceded to industrial mining companies.

◀ **Concession wall of Kamoto Copper Company (KCC).**

To date, it has been difficult for industrial mining companies to legally allow artisanal miners on their concession, since the company would then have to permanently relinquish that portion of its concession.[92] Additionally, the option of signing a lease agreement (*contrat d'amodiation*) with artisanal miners has not been very well received by many companies either, as it is not clearly provided for by law, and companies fear being held liable for poor working conditions and accidents among artisanal miners in their concessions. Nevertheless, some interesting pilot projects have already made use of such lease contracts (e.g. the Gécamines-Chemaf lease agreement at Mutoshi).[93] CSOs have however raised concerns on these lease agreements, as it provides little legal protection (e.g. security of tenure) to artisanal miners.[94] More recently however the DRC drafted new legal provisions (decree n° 25/05 of 21 February 2025) to facilitate the leasing of parts of industrial concessions to artisanal miners in collaboration with the public company Entreprise Générale du Cobalt (EGC).[95] (See text box on EGC.)

91 Notably 'Kasulo'. However, the part of the mine where most activity is currently taking place, 'Kasulo Résidentiel', falls outside of the ZEA.

92 Loi n°18/001 du 09 mars 2018 modifiant et complétant la Loi n° 007/2002 du 11 juillet 2002 portant Code minier, Article 30.

93 Trafigura (a multinational commodities trading company) had entered into a purchase agreement with Chemaf (which operated the mine under a lease agreement with Gécamines) to source cobalt from the mining cooperative COMIAKOL. The Mutoshi project, as an artisanal mining formalization initiative, also involved the NGO Pact to monitor compliance with the OECD Due Diligence Guidance.

94 As a result, artisanal miners are subject to the unilateral decisions of mining companies, which can change overnight and lead to forced eviction. This risk is illustrated by Chemaf and Trafigura's decision to suspend the Mutoshi pilot project with the onset of COVID-19 in 2020. This decision led to significant social tensions, and Chemaf's offices were ransacked by artisanal miners in December 2020. (Source: Umpula E., Buxton A. et Schwartz B., *Islands of responsibility? Corporate sourcing of artisanal cobalt in the Democratic Republic of Congo*, IIED et Afrewatch, 2021, p.20.).

95 Décret n° 25/05 du 21 février 2025 modifiant et complétant le décret n° 19/15 du 05 novembre 2019 portant sauvegarde des activités relatives aux substances minérales stratégiques d'exploitation artisanale.

Entreprise Générale du Cobalt (EGC)

EGC was established in November 2019 to promote the formalization of ASM in the cobalt sector. As a subsidiary of Gécamines, the government granted EGC a monopoly on the purchase of artisanal cobalt. In addition, EGC must ensure compliance with environmental, social and governance (ESG) standards and traceability measures.[96]

Although the project was ambitious, there were hardly any tangible results in the first years. The company was reportedly hampered by internal controversies and failed to obtain suitable sites to develop its activities.[97] Many local ASM stakeholders also expressed doubts as to whether EGC had the capacity to effectively address the ASM sector's deep-rooted informality.[98]

In May 2023, President Félix Tshisekedi appointed Eric Kalala as the new director of EGC in order to revitalize the company, and early 2024 Gécamines allocated EGC its first sites in Lualaba, more specifically the sites of Tombolo and Kanunka.[99] The EU soon capitalized on this momentum to start supporting EGC via the project Cobalt for Development, within the context of its strategic partnership with Kinshasa.[100] The Strategic Partnership Agreement between the United States and the DRC, signed in December 2025, also explicitly refers to EGC as a potential partner to help formalize the ASM sector.[101]

The political support for EGC now also seems to be translating into operational results. In February 2026, EGC agreed with the Swiss commodity company Trafigura on a first cobalt and copper shipment via the Lobito Atlantic Railway,[102] and it signed an agreement with the mining company ERG to formalize and support artisanal mining in sites on ERG's concessions.[103] Next, in March 2026, a strategic Memorandum of Understanding was signed with the Swiss company Mercuria to collaborate on formalization and development of the Kasulo mine in Kolwezi.[104]

Nevertheless, the question remains about the extent to which EGC will be able to address some of the ASM sector's structural challenges, such as competition with the Chinese and Lebanese trade networks in-country. Africa Intelligence reported that the government would consider the idea of asking these networks to pre-finance the purchase of small-scale cobalt through EGC.[105] Additionally, there is also the mistrust of local stakeholders towards EGC, and the question whether they will manage to tackle exploitative purchasing practices.[106] Furthermore, while Kinshasa puts its full support behind EGC, Africa Intelligence reported that EGC does not enjoy unanimous support by local stakeholders and some political leaders in Greater Katanga.[107]

96 See www.egcobalt.cd.

97 Africa Intelligence, *Tshisekedi appoints Eric Kalala as new head of EGC,* 29 May 2023.

98 IPIS interviews, Lualaba, March-April 2025.

99 La Guardia, *EGC: Tombolo classé parmi les gisements à haute teneur,* 21 September 2024.

100 Le Point.cd, *Partenariat UE-RDC : des financements concrets pour formaliser la filière cobalt et digitaliser les données minières*, 17 June 2025; Africa Intelligence, *Head of Entreprise Générale du Cobalt on charm offensive in Brussels*, 25 November 2024.

101 US Department of State, *Strategic Partnership Agreement between the Government of the United States of America and the Government of the Democratic Republic of the Congo,* 4 December 2025.

102 Trafigura, *EGC and Trafigura ship copper and cobalt to global markets via the Lobito Atlantic Railway,* 9 February 2026.

103 Global Mining Review, *ERG Africa and Entreprise Générale du Cobalt sign MoU to formalize responsible artisanal mining in the DRC,* 11 February 2026.

104 Mercuria, *Mercuria and EGC Sign Strategic MoU to Develop "Gold Standard" Responsible Cobalt Supply Chain in the DRC,* 26 March 2026.

105 Africa Intelligence, *Tshisekedi seeks to strengthen Entreprise Générale du Cobalt's monopoly,* 1 July 2025.

106 IPIS interviews, Lualaba, March-April 2025.

107 Africa Intelligence (1 July 2025), op. cit.

◀ **Houses near the remblais COMMUS in Tshabula near Kolwezi.**

As a solid legal basis through ZEAs has been lacking, the presence of artisanal miners is often tolerated by industrial actors, either to maintain social peace, or because they are not present on the ground to protect their concession. In this survey, the research teams encountered several cases where companies tolerated artisanal miners' activities, for example:

- The industrial miner Boss Mining did chase away the semi-industrial exploitations of some cooperatives near Kimbalasani, but currently tolerates artisanal miners at several other sites, such as Kiwana 2, Kiwana 3 and Bisele.

- At the mine 'Remblais Commus', the company COMMUS provides tailings to an estimated 520 artisanal miners, to enable them to work and not disrupt the company's activities.

- At Mushima Abelo, the company Kengere allows artisanal miners to work on the site twice a week (on Fridays and Saturdays).

Despite some efforts to maintain social peace, tensions between industrial (and semi-industrial) actors, and artisanal miners (and local communities) are omnipresent, and at times run high. Security measures that companies have implemented to protect their concessions, such as the recourse to the police, soldiers of the Congolese army (*Forces Armées de la RDC*, FARDC), and private security guards, often risk degenerating into intimidation and violence against artisanal miners.[108] (See text box.)

Violence against artisanal miners

Several cases of violence against artisanal miners have been reported in the past years in the Congolese Copperbelt. In June 2019, for example, the army burned down houses in the mining town of Kafwaya, in an attempt to evict thousands of artisanal miners from the nearby Tenke Fungurume Mine, owned by CMOC.[109] Shortly thereafter in July 2019, the Congolese police and army chased away about 20,000 miners from Glencore's Kamoto Copper Company (KCC) concession, following a fatal accident in the mine. According to Glencore, about 2,000 artisanal miners were entering its concession every day to illegally dig

108 Katz-Lavigne S., *Distributional impact of corporate extraction and (un)authorised clandestine mining at and around large-scale copper- and cobalt-mining sites in DR Congo,* Resources Policy, 65, 2020, p. 3-4; Cuvelier J., *Making Sense of Repressive Actions Against Artisanal Miners in Southeastern Democratic Republic of Congo,* Congo Research Briefs, Issue 6, October 2020, p. 1.

109 Ross A., *Send in the troops: Congo raises the stakes on illegal mining,* Reuters, 17 July 2019.

for ore.[110] More recently, in May 2023, at mining sites around the Kisankala village, artisanal miners were displaced by armed men to make room for Lebanese industrial miners.[111]

Conflicts between artisanal miners and industrial mining actors can also arise when mining concessions change ownership: in 2022, artisanal miners had to clear the artisanal mine of Rulco Kilamusembo in Kolwezi, after the owner Gécamines decided to lease the site to the Chinese company Kinga Kila Mining. The eviction of artisanal miners caused violent demonstrations in the neighborhoods of Luilu and Tshamundende.[112]

Nevertheless, artisanal miners also form a large pressure group, and their protests sometimes threaten to turn violent. An example of this is the incident in early November 2025 near KCC's KOV mine, where an angry mob of artisanal miners stoned a bus that transported employees of the mining company.[113]

These conflicts can also restrict access for industrial concession holders. At Shabara, for example, artisanal and semi-industrial exploitation is controlled by the cooperatives COMAKAT, COOPEMIAK, and COMAMIT. Without authorization from the cooperatives' managers, it is impossible to pass through the roadblocks that have been established at the entrance of the mining site. Even the titleholder Mutanda Mining (MUMI), a subsidiary of Glencore, does not have access to its concession as the artisanal miners claim the site has been ceded to them before the arrival of MUMI.[114]

The tensions surrounding the difficult coexistence between artisanal and industrial mining have become even more complex as levels of mechanization at ASM sites are rising. Several industrial concession holders complain that, with the support of political elites, some of the mining cooperatives' operations have grown into near-industrial exploitations, representing significant losses for them. A 2025 investigation by ERG (whose subsidiaries Swanmines, COMIDE and Boss Mining hold several permits in the region) claims that the "quasi-industrial" illegal activities within its concessions allegedly generate nearly $2bn a year, "with the alleged support of provincial political figures, members of the president's family, and senior military officials with connections to mining operators and logisticians. The activity is now uncontrollable and affects ERG's activity to the tune of $150m per month, or $5m per day".[115]

◄ **Bus used to transport employees of KCC's industrial mine, equipped with protection against stone throwing.**

110 Ross A., *Congo evicts illegal miners from Glencore project, sparks protests,* Reuters, 4 July 2019.

111 Actualité.cd, *Lualaba: l'exploitation « illégale » d'une mine à Kisankala fait des victimes,* 9 June 2023.

112 Mines.cd, *Lualaba: Les creuseurs promis de récupérer leurs produits miniers saisis lors du déguerpissement dans le site Rulco,* 15 August 2022.

113 France 24, *RD Congo : Un bus caillassé par des mineurs artisanaux à Kolwezi*, 2 December 2025.

114 Africa Mining Intelligence, *Much ado over Glencore-owned Shabara mine*, 23 July 2021; Mines.cd, *Exploitation artisanale de cobalt, l'enfer sur la terre*, 6 November 2022.

115 Interview with representatives from an industrial concession holder, Kolwezi, June 2025; Africa Intelligence (6 October 2025), op. cit.

3.3. Health and safety

Characteristic problems in the artisanal mining sector include hazardous working conditions and a lack of respect for health and safety standards. Insufficient investments in maintenance, inadequate oversight and a lack of personal protective equipment undermine safety at the mining sites.

Various sites are struggling with excess water that they are unable to drain, which can potentially create dangerous situations. The most severe case in our survey was a collapse at the mine T17 in the period April/May 2025, where 17 people died and 120 were injured after they got trapped underground as tunnels flooded.

Serious accidents are common.[116] In total, interviewees reported at 15 mines (out of 47) that at least one accident had occurred within the six months preceding the site visit, involving 326 injuries and 33 deaths. There have also been several grave accidents in the months following IPIS' site visits. For example, a grave accident happened at the mine Sierra, near the village of Kisankala. The day after the IPIS team conducted interviews at the site, which employed around 3,500 miners, a landslide reportedly caused several artisanal tunnels to collapse, while more than 200 people were believed to be trapped underground.[117]

Some stakeholders have raised the issue of health risks arising from the radioactive or ionizing nature of certain ores. For example, the T17 site has been officially declared radioactive, while young people, women and children have been working for years at the site.[118]

The use of personal protective equipment by artisanal miners also seems to be very limited, which exposes them to serious risks. At most sites (30 out of 47 mines in production), IPIS teams did not observe any protective equipment. At 17 sites, some protective equipment has been observed, including mostly gloves (8), rubber boots (8), protective glasses (5), and helmets in a few cases.

There are also serious questions on social protection among the ASM workforce, as most miners work informally. A recent study estimated that "*nearly two-thirds of all workers have gotten hurt or sick because of their work in their most recent job in cobalt mining.*"[119] As seen in the section 1.4 on cooperatives, while some cooperatives are appreciated for the social protection they provide, most cooperatives do not seem to take sufficient care of injured miners.[120]

◄ **Artisanal miners at the entrance of mining pits at the Tilwizembe copper site in Mutshatsha territory.**

116 Such incidents are for example frequently reported on the Kufatilia dashboard. Kufatilia is a network of CSO organizations monitoring incidents in DRC mineral supply chains. (Information on incidents can be consulted at the "Kufatilia dashboard of mining-related incidents in eastern and southern DRC")

117 La Guardia Magazine, *Kisankala : 65 mineurs artisanaux sauvés suite à l'effondrement d'un site minier*, 10 May 2025.

118 Mines.cd, *Kolwezi : Une urgence radiologique décrétée sur le site minier T17,* 24 mars 2026.

119 US Department of Labor, *Forced Labor in Cobalt Mining in the Democratic Republic of the Congo*, May 2023, p. viii.

120 Akilimali J.B. and Mwana Biningo N.M. (August 2023), op. cit., pp. 82-83.

Besides the direct risks that miners face, surrounding communities are also exposed to health and safety risks, including elevated metal levels in the blood and urine, especially for children, as well as the contamination of local agricultural lands.[121]

The observations above highlight the significant health and safety challenges. Mwishamali Lukobo and Geenen, however, warn that such observations are often (mis)used to create a narrative that criminalizes artisanal mining, portraying it as irresponsible, dangerous, and illegal.[122] They cite, for example, an incident at the Kalando mine (Mutshatsha territory) in November 2025, where dozens of miners died when a bridge collapsed.[123] International media portrayed the artisanal miners as illegal intruders and seemed to blame them for their own deaths as they "*built the makeshift bridge themselves*". In reality, however, the situation is far more complex, and such unsafe conditions stem from the marginalization of artisanal miners[124] and the lack of legal opportunities for them. Moreover, the incident reportedly occurred after soldiers guarding the site opened fire on the miners, causing them to flee in panic across the bridge.[125]

◀
Dust generated by the circulation of lorries of a semi-industrial operation at the Enda Enda site.

3.4. Children

As for child labor, IPIS teams identified an estimated 641 underage mine workers (under 18 years of age), or no more than 0,6% of the total workforce in our survey (109,107). This contrasts sharply with the widespread perception that cobalt mining is characterized by child labor. It is important to underline that the figures in this study refer specifically to children actively working in mining, and not to children who are merely 'present' in or around mining sites. Since mining in southern DRC often takes place near residential areas, children are often present in the vicinity of the mining sites, and their parents, without necessarily working in the mines. This may have contributed to the misperception of child labor in the sector.

Nevertheless, in addition to children directly participating in mining operations, there are also children who perform auxiliary services in the mining site, including transport and the selling of food, drinks, and consumer goods. In our study, children providing these indirect services were observed in about 26% of active mines (12 out of 47). At a majority of these sites (7 out of 12), children were employed in field restaurants, an observation that supports previous findings in an EITI report, noting that restaurant holders are the most important employers

121 Akilimali J.B. and Mwana Biningo N.M. (August 2023), op. cit., pp. 26-27.

122 Mwishamali Lukobo E. and Geenen S., *The miners' anger: An attempt at understanding,* Review of African Political Economy, 27 May 2026.

123 The reported number of deaths varied between 32 and 49, depending on the source. (Source: BBC, *Dozens die in DR Congo mine after makeshift bridge collapses*, 17 November 2025; Mines.cd, *Mulondo, le site minier du chaos — 49 morts dans un drame au Lualaba*, 17 November 2025).

124 Mwishamali Lukobo E. and Geenen S. (May 2026), op. cit.

125 BBC, *Dozens die in DR Congo mine after makeshift bridge collapses*, 17 November 2025.

of children in mining sites, as they rely on family members to help them.[126]

Additionally, child labor at the mining sites is seasonal: it increases during school holidays and weekends.[127] The number of children among the mining workforce thus represents a snapshot.

Child labor in 'tolerated sites' is relatively lower than in sites considered 'clandestine'. 49% of the underage miners observed in our survey (314 out of 641) worked at the 6 clandestine sites in our survey (out of a total of 47 active sites). Tshabula, for example, is a clandestine mining site composed of waste rocks coming from the mining company COMMUS. As the waste rock is not fenced off and is located adjacent to family homes, anyone can enter the site, including children, some of whom work in the mine.

◀ **Market near the Tshipuki artisanal mine.**

3.5. Interference of unauthorized state services

The presence of state security actors and other unauthorized actors at mining sites is a significant problem for the ASM sector in Lualaba. It undermines government oversight, formalization efforts, and exposes artisanal miners to extortion. According to the Congolese mining legislation, only SAEMAPE and the Mining Division are mandated to operate at the level of the mine.[128] A few other government agencies, such as the mining police (PMH), may also perform relevant functions at mining sites. Yet, there is also a range of other state actors whose presence arouses much more suspicion, in particular security forces such as the military, police forces, and the national intelligence services (*Agence Nationale de Renseignements*, ANR), as well as services under the jurisdiction of the province, such as the Anti-Fraud Service and the Provincial Inspectorate of Mines.[129]

The presence of the military (FARDC) has been reported at 64% of the ASM sites in our survey (30 out of 47 sites). There are some geographic differences however, and the military presence is most outspoken near the villages of Kakanda (at 80% of the mines, 4 out of 5), Kisanfu (6 out of 8), and Lenge (all 8 sites).

Security forces are typically present at the request of cooperatives and their partners — including semi-industrial operators as well as *dépôts* — to ensure security and protect their assets. Usually, the costs associated with their presence are covered by the cooperatives or their partners. Nevertheless, several interviewees reported direct interference of the military at mining sites, including imposition of

126 EITI (March 2023) op. cit., p. 128.

127 Sovacool B.K., When subterranean slavery supports the sustainability transitions? Power, patriarchy and child labour in Congolese artisanal cobalt mining, The Extractive Mining Industries and Society, 2021, p. 283.

128 EITI refers to the ministerial decree n° 0149/CAB.MIN/MINES/01/2014 and n°116/CAB/MIN/FINANCES/2014 of 5 July 2014 on the « *Manuel des procédures de traçabilité des produits miniers, de l'extraction à l'exportation* ». (Source: EITI (March 2023), op. cit., p. 74.)

129 EITI (March 2023), op. cit., pp. 79-80.

illegal entry fees on miners and traders, appropriation of part of the artisanal production, involvement in mineral trade (e.g., through pre-financing artisanal mine operations), and monopolization of the sale of other goods at the mine. Additionally, there have been several complaints about the military harassing people and miners.

At the Mulondo mining site (Mutshatsha territory), for example, FARDC units are present to protect the semi-industrial exploitation (and processing facility) of the company Tengyuan Copper & Cobalt Resources (TCC), which is a partner of the cooperative COMPEA SCOOPS. These FARDC units, however, also levy illegal payments from the artisanal miners working at the waste rocks (*remblais*). Similarly, at the Enda Enda mining site, a company reportedly named "Furah" started a semi-industrial exploitation in early 2025. It dumps the *remblais* in another location within the mining site that is under the supervision of the Republican Guard. The latter collaborates with the cooperative to allow miners to work on these waste rocks in exchange for a share of the production. More examples of military interference in mining, especially near Kisanfu, Kakanda, and Lenge are provided in the text box.

Examples of military interference in mining near Kisanfu and Kakanda

The FARDC presence at sites near Kakanda, Kisanfu, and Lenge is omnipresent, and interviewees reported many complaints about the behavior of these units. Below are a few illustrative examples.

Around Kisanfu:

1. At Kisankala and Mpompe, the FARDC control access to waste rocks and impose fees on artisanal miners entering the site (e.g., 2,000 Congolese Francs (FC), or US$ 0.7, at Mpompe).

2. At the Mpompe mining site, the military forces charge levies on mineral transport, including 5,000 FC (US$ 1.7) for motorcycles carrying mineral ores.

3. At Kalukundji, all production must be sold exclusively at the site's *dépôt*, and the military — who claim that they protect the site on behalf of politically influential persons in Kinshasa — collect taxes at the roadblock to enter the *dépôt*.

4. FARDC members are also involved in the mineral trade in the area.

Near Kakanda, at the site Kiwana 2, the military reportedly had a monopoly over the sale of some consumer goods such as alcohol and cigarettes. Additionally, they impose a levy on artisanal miners' production and assault miners who refuse to pay these levies.

While artisanal miners complain about abuses by security forces, industrial operators accuse those same forces of collusion to enable illegal artisanal mining within industrial concessions. Although concession holders expect the security services to safeguard their sites, instead, in some cases, the police and military have provided access to artisanal miners in exchange for an entrance fee.[130]

The problem of the militarization of mining sites is broader than the mere presence of these soldiers. To address this issue, it is important to recognize the political dimension of the problem. These military

130 EITI (March 2023), op. cit., pp. 88-89.

units are often present at the request and with the financial support of local — political or military — heavyweights who protect their interests (or the interests of their partners), thereby shielding their activities from the scrutiny of legally entitled government agents.[131]

Additionally, the problem of the interference of unauthorized actors also extends beyond the military. Many actors are trying to skim off a portion of the profits from the mining sector, including anti-fraud services, various intelligence services, and the migration services (*Direction Générale de Migration*, DGM). In our survey, for example, we observed the presence of the intelligence services (ANR) at 53% of the mines (25 out of 47), and the *Commission Nationale de Lutte contre la Fraude Minière* (CNLFM) at 10 sites. These services often collect small contributions, for example, when mineral bags are being loaded on trucks to be transported from the site to the *dépôts* or to processing facilities. Often, such payments are not perceived as outright extortion involving a high degree of coercion, but rather concern small tips agreed upon by the cooperative. Nevertheless, the multitude of illegal levies weighs on economic actors. An EITI report of 2023 provided a very illustrative example: only 35% of the taxes paid by the *dépôt* denominated Willy would have a legal basis, while the remaining 65% would be collected by services that are not entitled to do so.[132]

Additionally, payments are also extorted at roadblocks along routes leading to *dépôts* and processing facilities. At 51% of the mining sites (24 out of 47), roadblocks levy money between the mining site and the trade hub where minerals were being sold. For example, several government services (such as PMH and ANR) operate checkpoints around Kisanfu to verify mineral chain-of-custody documentation, while simultaneously collecting payments from motorcycles and trucks transporting minerals. Security forces also levied taxes along the exit routes of 21 (out of 47) mining sites in our survey, especially in Kakanda and Kisanfu.

Similarly to the military presence at mining sites, levels of coercion from other state agencies vary considerably. At some sites in the center of Kolwezi, it reportedly involved relatively minor payments, such as the 1,000 FC (about US$ 0.35) charged to motorcycles carrying minerals at a PMH roadblock near the mining site of Biwaya. In the mining areas of Kisanfu, Kakanda, and Lenge, by contrast, roadblock operators were more insistent. At the two roadblocks between the mining site of Kiwana 2 and the *dépôts* of Museba (Kakanda area), each motorcycle transporting minerals pays a total of 57,000 FC (US$ 20). A motorcyclist transporting minerals from the Sierra mine to Kisanfu pays a total of 20,000 FC (US$ 7) across four roadblocks, while a truck pays 550,000 FC (US$ 190). Motorcycles transporting minerals from the Mulondo mine to *dépôts* in Papsy pay approximately 55,000 FC (US$ 19) in total at the five roadblocks they encounter.

◀ **Roadblock near Dynamitier mine in the surroundings of Kolwezi.**

131 At several sites visited by the research teams, the military actors present referred to political heavyweights supporting their presence. Additionally, several articles and reports make reference of the same problem. See for example: Africa Intelligence (6 October 2025), op. cit.; ITIE-RDC (July 2025), op. cit., p. 34.

132 EITI (March 2023), op. cit., p. 41.

3.6. Manifestation of political tensions at ASM sites

The security situation is relatively calm in Lualaba province. Several points of (political) contention have, however, been reported, which are causing tensions to run high.

In Lualaba, tensions exist between the ruling party, Union pour la Démocratie et le Progrès Social (UDPS), and Union Nationale des Fédéralistes du Congo's (UNAFEC) youth groups (JUNAFEC), rooted in both political rivalry and ethnic divisions between Kasai and Katanga communities.[133] Pole Institute reported, for example, that UDPS allies seek political support to acquire access to mines, which in turn triggers strong resistance from JUNAFEC members.[134] Observers have reported how certain cooperatives are supported by UDPS militants.[135] The UNAFEC-UDPS rivalries at times escalate into violence,[136] which extends to mining sites.[137] In IPIS' survey, JUNAFEC youth were present in many mines in the Kisanfu area, where they often acted as an armed militia and exerted de facto control. In Lenge, conflicts were also reported between groups of miners, as JUNAFEC youth attempted to start working at and take control of the mining site.

The influence and protection that politically influential people exert over cooperatives also create tensions and security risks. While cooperatives are supposed to represent the socioeconomic interests of artisanal miners, they have instead developed into vehicles for protecting the economic interests of local elites and their political and military backers.[138] The latter use their political power for influence peddling, and to call on the military to protect their interests, which directly contributes to further militarization and insecurity.[139]

◄ **Artisanal miners carrying bags of ore at the Tilwizembe copper mine.**

133 The political party UNAFEC was founded in 2000 and has campaigned for the autonomy of (former) Katanga province in the framework of a federal state (see RFI, *« Campagne en faveur du fédéralisme au Katanga »*, 12 août 2012, and Gobbers E., *« Ethnic associations in Katanga province, the Democratic Republic of Congo : multi-tier system, shifting identities and the relativity of autochthony »*, The Journal of Modern African Studies, 54, 2 ? 2016, p. 227); JUNAFEC is the party's youth wing.

134 Akilimali J.B. and Mwana Biningo N.M. (August 2023), op. cit., pp. 81-82.

135 AFREWATCH, *« AFREWATCH dénonce la présence de l'armée dans les sites miniers artisanaux et condamne les fusillades contre les creuseurs dans la carrière de Mulondo »,* Communiqué de presse n° 7/AFREWATCH/2025.

136 Radio Okapi, *Bagarre entre militants de l'UDPS et de l'UNAFEC après la mort d'un jeune homme à Kinsafu*, 16 June 2025.

137 Akilimali J.B. and Mwana Biningo N.M. (August 2023), op. cit., p. 81.

138 Mwishamali Lukobo E. et al. (2025), op. cit., pp. 18-19.

139 Africa Intelligence, *Artisanal mining regulator challenges Fifi Masuka's governorship*, 4 February 2026; Africa Intelligence (6 October 2025), op. cit.; Africa Intelligence, *Army generals accused of looting ERG mines*, 27 March 2026.

Conclusions and recommendations

The artisanal mining sector has significant development potential in the former Katanga province, especially in a country where an estimated 74% of the population lives in poverty.[140] Copper and cobalt are abundant, and artisanal mining pays relatively well. Yet, after more than three decades of intensive artisanal mining in the Congolese Copperbelt, the sector has achieved little in terms of sustainable development. Hundreds of thousands miners work in the artisanal mines of Lualaba, but the local communities continue to face poverty; their living environment is threatened by pollution and expanding artisanal and industrial exploitations; and working in the mines is first and foremost characterized by unsafe working conditions and abuses by the military, state agents, and commercial actors.

Since 2002, however, the DRC has had a Mining Code in place (revised in 2018) which creates a clear regulatory and institutional framework for the organization of the artisanal mining sector. The legislation determines that miners should extract minerals under the supervision of mining cooperatives. Next, local mineral traders, or *négociants*, can purchase the mineral production to sell it on to processing facilities (or *entités de traitement*). These processing facilities are entitled to export the minerals.

According to the Congolese law, only Congolese citizens can be officially recognized as artisanal miners and *négociants*, in order to promote the emergence of a Congolese middle class. Additionally, mining cooperatives must ensure that operations are conducted professionally and that miners' interests are adequately represented.

This study aims to develop a better understanding of the artisanal copper and cobalt sector and the key challenges that have prevented the implementation of the regulatory framework and limited its contribution to local development. To this end, IPIS mapped 51 artisanal copper and cobalt mines in Lualaba province, employing an estimated 109,000 miners. The study observed several issues that undermine the potential for local development and socio-economic progress of ASM actors, including: elite capture of mining cooperatives, the vertical integration of foreign investors operating through Congolese front men, limited legal space for artisanal miners to operate, a difficult coexistence with industrial and semi-industrial miners, and extortion by state security forces.

According to the law, artisanal miners are obliged to work within designated artisanal mining zones (ZEAs) and under the supervision of registered mining cooperatives. However, there are few viable ZEAs: in fact, only one artisanal mine in our survey was partly located within such a zone; most miners worked in so-called "tolerated" mines, which are almost all located within industrial concessions (in this respect, it is important to point out that only six clandestine mines were included in the survey). These informal arrangements to tolerate artisanal miners provide miners little legal security and leave them vulnerable to extortion by other supply chain actors and state (security) services. The creation of legal spaces for artisanal miners, and especially viable ZEAs, is thus an essential step towards a better regulation of the sector and could ease the tensions with industrial concession holders.

To create viable ZEAs, it is recommended to collaborate with SAEMAPE, the provincial governor, the provincial mining division, and the mining cadaster (CAMI) to identify promising exploitations that could be formalized.[141] Additionally, collaboration with the DRC's geological service (SGN-C) is needed to enhance geological prospecting capacities within the ASM sector. Besides, the ARECOMS measures (see below) should be further examined to assess the opportunities they present for legal collaboration between industrial concession holders and artisanal miners.

140 Deberdt R. and DiCarlo J., *DRC is the world's largest producer of cobalt – how control by local elites can shape the global battery industry*, The Conversation, 4 September 2024.

141 As foreseen in article 109 '*De l'institution d'une zone d'exploitation artisanale*' of the mining code (Loi n°18/001 du 09 mars 2018 modifiant et complétant la Loi n° 007/2002 du 11 juillet 2002 portant Code minier.), and Article 25 quindecies 'Formalisation et viabilisation des sites miniers artisanaux' of the Règlement Minier, Décret n°038/2003, tel que modifié et complété par le décret n° 18/024 du 8 juin 2018.

Mining cooperatives are supposed to promote and respect "cooperative principles"[142], but in reality, they are often elite structures that protect the interests of their leaders and (political) backers. Approximately half of the cooperatives in our survey were perceived to do little or nothing to represent the interests of artisanal miners. Interference by politically influential individuals has increased significantly in recent years, and these cooperatives appear to be increasingly partnering with external investors to promote semi-industrial mining. In doing so, they often drive out artisanal miners and have, in fact, become one of the greatest threats to the artisanal mining sector.

The promotion of a formal and responsible ASM sector will require stronger, more inclusive, and more accountable mining cooperatives. Support for cooperatives should therefore enhance their technical, legal, and organizational capacities, while also promoting inclusive governance and their responsibility to monitor working conditions. It should help to enhance the legitimacy of the cooperatives in the eyes of their members. In this regard, it would be opportune to explore with the Ministers responsible for Mines and Finance how Article 25 vecies of the Règlement Minier could be implemented. Under this provision, cooperatives would receive financial incentives (such as favorable tax and customs regimes) in exchange for adopting a development plan prepared by the cooperative. Such a plan would include a strategy to improve working conditions, health and safety standards, and environmental protection, and to promote professionalization of the exploitation in the long run.[143] Furthermore, it is also important to examine how cooperatives can address the socioeconomic concerns of their members. For example, many artisanal miners are dissatisfied with the lack of transparency around the price setting of their mineral production, and the fact that they are only renumerated for one mineral found in the ores they produce.

The artisanal trade chain is also heavily controlled by foreign capital through vertical integration. While the upstream part of the supply chain (artisanal miners and *négociants*) is in principle reserved for Congolese nationals, foreign investors often hide behind Congolese actors — including cooperatives, traders and *dépôts* — and as such determine local trading patterns. Consequently, miners are frequently subjected to exploitative purchasing practices.

Mining cooperatives need assistance to obtain access to (formal sources of) finance, to invest in professionalization and health and safety, and to cover the costs associated with formalization. It would make them less reliant on informal forms of pre-financing. It is interesting to further explore the idea of how existing trade networks could channel their pre-financing via *Entreprise Générale du Cobalt* (EGC), or to assess what government funds exist to facilitate access to finance.

The political dimension of the previous issues, in which (political and military) influential people act as patrons for cooperatives and traders with their opaque practices, makes the challenge all the greater. It means that (international) initiatives to promote responsible trade must realize that technical solutions alone, such as the creation of ZEAs, will not suffice. They must be accompanied by more politically sensitive efforts that address these conflicts of interest among political and military elites, as well as the socioeconomic marginalization of artisanal miners. In this regard, academics have also pointed out that focusing on technical challenges (such as the lack of ZEAs) and overemphasizing the illegal aspects of artisanal mining (which criminalizes and marginalizes artisanal miners) disregards the political dimension of the problem and avoids addressing the structural causes of informal ASM.[144]

State security services and some other state actors are known to extort artisanal miners. The military was present at 64% of the ASM sites surveyed in Lualaba. While they are usually deployed at the request and expense of cooperatives and their partners, interviewees reported widespread misbehavior, including illegal fees, involvement in the trade of minerals and consumer goods, and the harassment of miners and civilians.

The DRC government should urge the withdrawal of military personnel from artisanal and semi-industrial mining sites, as their presence increases insecurity and the exploitation of ASM stakeholders and hinders

142 Including 'voluntary and open membership', 'democratic ownership', 'economic participation by cooperative members', and 'independence'. (Source: Règlement Minier, Décret n°038/2003, tel que modifié et complété par le décret n° 18/024 du 8 juin 2018, article 233bis).

143 Règlement Minier, Décret n°038/2003, tel que modifié et complété par le décret n° 18/024 du 8 juin 2018, Article 25 vecies (*'Mesures incitatives pour la promotion de l'exploitation minière artisanale'*).

144 Mwishamali Lukobo E. and Geenen S. (May 2026), op. cit.

access to these sites by other legitimate government agencies. In this regard, it is also important to protect civic space to enable local civil society to scrutinize ASM stakeholders and governance.

Finally, there is also a lack of transparency in the copper and cobalt supply chain in Lualaba. Hundreds of *dépôts* purchase minerals without making any effort to determine their origin. Next, the artisanal supply chain is mixed with industrial production at the level of processing facilities. As a result, there are no formal exports of artisanal 2C minerals from the DRC.

To promote mineral traceability in Lualaba province, as well as to improve governance of the artisanal mining sector and strengthen compliance with environmental, social and governance (ESG) standards, the government has launched several interesting initiatives aimed at formalization. These include the establishment of the *Centre de Négoce* of Musompo, the creation of EGC,[145] and the measures announced by ARECOMS (which prohibit industrial producers from mixing their ores with 'uncertified' artisanal cobalt, but allow them to collaborate with EGC to permit artisanal mining on their concessions).[146] Additionally, some traceability initiatives have been developed, including the *Initiative pour la Traçabilité de Base* (ITB), launched by SAEMAPE in 2024,[147] and a blockchain-based traceability system introduced by the Congolese mining services company Sud South and Minespider (linked to the establishment of the *Centre de Négoce* de Musompo).[148] [149]

However, it remains to be seen to what extent these initiatives can truly advance the formalization of the sector, increase transparency, improve working conditions, and promote sustainable development in surrounding communities. Although each initiative faces specific challenges, they all seem to struggle with the structural issues mentioned above, including elite capture, marginalization of artisanal miners, exploitative trading practices (and a lack of transparency on price setting), (illegal) vertical integration of foreign investors, influence peddling and abusive behavior by state (security) agents. When critically reflecting on these issues, however, it is important to hold the specific actors accountable for their shortcomings and responsibilities, rather than criminalizing the entire sector. Because above all, it is the hundreds of thousands of artisanal miners, and their families and communities, who are the main victims of these practices. There is an urgent need to shift away from a paradigm that views artisanal mining primarily as a problem and a threat to industrial mining, towards a rights-based approach in which mining stakeholders protect the rights of artisanal miners, as provided for under Congolese law and international ESG standards.

145 EGC was created in November 2019 to promote the formalization of artisanal cobalt mining. As a subsidiary of Gécamines, the government has granted EGC a monopoly over the artisanal cobalt supply chain. In addition, it must ensure that the production complies with traceability measures, and environmental, social and governance (ESG) standards.

146 ARECOMS is the government agency responsible to regulate and control the production and export of "strategic minerals." Measures have been outlined in the following communiqués: ARECOMS, *Suspension temporaire de l'exportation du cobalt de la République Démocratique du Congo*, Communiqué N° 2025/001, 22 février 2025; ARECOMS, *Mesures réglementaires urgentes relatives à la filière du Cobalt*, Communiqué N° 2025/002, 22 février 2025.

147 The ITB is an initiative focusing on traceability, certification, and due diligence that operates from the mine site and incorporates technical aspects. This initiative serves as an upstream complement to the ITOA initiative for the gold industry. https://saemape.cd/projets-en-cours/ .

148 Minespider, *Sud South and Minespider to Implement Traceability Solution for Copper and Cobalt in DRC's Lualaba Province,* 29 July 2022.

149 An IPIS-GIZ-Levin Sources report from June 2026 analyses the rapidly evolving landscape of digital traceability systems, such as Minespider, for critical mineral value chains. While digital traceability has become central to efforts aimed at strengthening responsible sourcing, ESG oversight, and supply chain resilience, important questions remain about its feasibility, scalability and implications for producer countries and ASM stakeholders. (See: Merket H., Elnour A., Grundel H. and Moriconi J., *Assessing digital traceability systems for critical mineral value chains: Aligning upstream and downstream agendas*, GIZ, IPIS and Levin Sources, May 2026)

Annex: Mining cooperatives and *groupements de creuseurs* active on copper and cobalt ASM sites in the province of Lualaba

Mining site	Number of workers	Mining cooperatives
Bangwe Mashamba	20	COMUDEKAT
Biwaya	1,500	COOPEMIAK, COMIKO, COMIALU, CDMRK
Biwaya Potopoto	20	SCOMIS, COMA
Brazza-Kinshasa	80	CM RUKAT
Chipuki	5,000	SCOOPS M.M, Regroupement des creuseurs
Coline 10	1,800	COMPEA SCOOPS
Dynamitier	125	CMDCO/Espoir
Enda-Enda	1,088	CMDS
GH Remblais	5,000	COMDK, COMEAK
Kabundji	40	COMUKAT
Kadinsuki	60	
Kakanda Nord	420	
Kalukundji	350	COMIBAKAT
Kamashamba	60	CM ALFAJIRI
Kamilombe	18,000	CMDS
Kapemba	234	COMIBAKAT
Kasulu Résidentiel	200	
Kisanfu Semba	150	COMIA-SCOOPS, CMBRD
Kiwana 2	750	COMIDEK, Regroupement des creuseurs
Kiwana 3	50	CMM
Kyabukamba	10	
Lenge	400	COMEAL SCOOPS

Mashamba Est / Malo	380	Regroupement des creuseurs
Mashitu	250	COMPEA SCOOPS, Regroupement des creuseurs de Kisankala
Menuiserie	13,500	COMIKIS
Mpompe	450	SOCOMAM, Comité des EMA
Mulondo	250	COMPEA SCOOPS
Mushima Abelo	250	SOCOMIPA, HEWA BORA, COMITICO, SOCOMIDEL, MALI YETU
Mutoshi Résidentiel	500	
Mwilu	150	
Pungulume Est	10	SOCOMIBAMI, LUBI
Pungulume Principal	243	COMIBAKAT
Remblais COMMUS	524	
Safi Morgue	800	
Shabara	6,000	COMAKAT, COOPEMIAK, COMAMIT
Sierra	3,500	Regroupement des creuseurs de Kisankala
Bajima	300	SOCOMIBAMI, LUBI, CM ALFAJIRI
Mutoshi	22,405	COMIAKOL, COMIAU, CMBRD
Kafumbo	700	COMIBAKAT
Kalema	20	SOCOMED
T17	6,000	
TFM Kisankala	330	SCOMAPS, CM ALFAJIRI
Tilwezembe	13,000	COMIBAKAT
Tshabula	2,500	
Tshala 52	320	COGEKAM, COMIDECO, COMINA, COMISAC, SOCIMIKI, SOCOMAM
UCK Drain	749	SCOMIKAS, COMIPROFI
Volcano	619	EMAK-C

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V.U. Filip Reyniers, Directeur, IPIS vzw, Italiëlei 98A, 2000 Antwerpen | Layout: BRUSK Design | D/2026/4320/05