



Coming Clean: A Proposal for Getting Conflict Minerals Certification on Track

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Executive Summary

Tremendous strides have been made in recent years to cut the conflict minerals trade in eastern Congo. In the past four years, governments, nonprofits, and private sector actors in Africa, the U.S., and Europe have built regulatory frameworks and stimulated the global market for responsibly sourced minerals. Progress on reforming supply chains and demilitarizing mines has addressed many negative elements of the conflict minerals trade and the economic drivers of war in eastern Congo, as armed groups are much less present in mines than in the past.

However, the progress in certifying minerals from the Great Lakes region as conflict-free is at a crossroads. If Rwanda, Congo, and regional states do not take urgent steps to complete the mineral certification process in the next few months, multinational companies may stop purchasing many minerals from the region that cannot credibly be certified as conflict-free. These regional governments, together with strong encouragement from the U.S. and European governments, need to focus urgently on fully implementing the International Conference on the Great Lakes Region, or ICGLR, certification process. States are starting to issue certificates for easy-to-certify mines using ad hoc measures, but interim steps will not work for all mines.

Rwanda issued its first conflict-free certificate on November 6,¹ and Congo plans to begin issuing certificates for mines and exporters soon. The regulatory framework for minerals certification is called the ICGLR Regional Initiative against the Exploitation of Natural Resources, or RINR. The mineral certification scheme, known as the Regional Certification Mechanism, or RCM, a central component of this initiative, remains incomplete. The structures for ensuring independent third-party audits, overseen by a committee of electronics companies, regional governments, and nongovernmental organizations—the ICGLR Audit Committee—are not yet finalized. The fourth part of the process, the ICGLR Independent Mineral Chain Auditor, tasked with ensuring transparency and thwarting fraud and smuggling, has not been assembled. Without the audits and independent oversight mechanisms, minerals from the region cannot be fully certified as conflict-free, purchased as such, and directed toward the broader global market.

The ICGLR Certification Scheme has four main components:

1. **Mine inspections and traceability:** Mines get green, yellow, or red status as “conflict-free” or not, and minerals are placed in “bag and tag” or similar tracing systems. Thus

far, 55 mines have green status, and approximately 500 mines have “bag and tag” systems. Minerals are tracked from mine to export. (Status: in place/developing).

2. **Information database:** Mineral tracking via a regional database (Status: in development).
3. **Audits:** Independent third party audits, overseen by audit committee made up of electronics companies, regional states, and NGOs (Status: not yet finalized).
4. **Independent monitoring:** Independent Mineral Chain Auditor, or IMCA, to check for smuggling and fraud and to sanction smugglers (Status: not in place).

A series of temporary, ad hoc solutions currently address some immediate needs of companies seeking conflict-free minerals. To date, electronics and other companies have relied on the “bag and tag” system, run by the tin and tantalum industries, to purchase minerals from Congo and the region. This system, implemented on a wide scale in Rwanda and in some parts of Congo, deserves praise for being a good first step, but the system remains opaque and it does not guarantee conflict-free minerals. Its incident reports are not made public, numerous cases of smuggling have been documented within the system, and there is no uniform, independent system for noncompliance.

Congo and Rwanda have also used private consultants paid by independent third parties to attempt to certify the first mines and exporters, namely the Solutions for Hope mines in Congo and the large-scale mines in Rwanda. Ad hoc solutions like these, while preferable in the absence of more robust measures, will not work for all mines and cannot indefinitely provide electronics and other end-user companies with the credible assurances that they need to ensure they are purchasing conflict-free minerals on a large scale. An interim solution may be necessary in the short term, but it must meet international due diligence standards, and should be buttressed by Rwanda and Congo publishing production data of their mines. Moreover, a sustainable ICGLR regional solution must be found for the long-term. Without this assurance, the companies may stop buying many minerals from Rwanda, Congo, and/or the region.

On November 13-15, governments, the private sector, and civil society will meet in Rwanda for the Organization for Economic Cooperation and Development, or OECD-ICGLR-UN Forum on Responsible Mineral Supply Chains. International stakeholders should use this opportunity to reinvigorate efforts with regional partners. We offer the following recommendations:

1. Electronics and other end-user companies should set a deadline for Rwanda, Congo, and the ICGLR that if all four components of the certification process are not in place and being used by the states within a set timeline (such as six months or one year), minerals from the region will be deemed noncompliant with international due diligence standards and unacceptable within the Conflict-Free Smelter program.
2. The U.S. and European Union, or E.U., should work with Congo, Rwanda, and the ICGLR to come up with a workable interim solution that is agreed to in writing by all stakeholders for covering the role of the Independent Mineral Chain Auditor and other key elements of the system for the temporary period (such as six months or one year). The entity that serves in an interim capacity must have the authority to issue corrective actions from those exporters who do not comply with the certification process. Mine site validation, chain of custody assessment, and export control analysis should be included.

3. The U.S., E.U., and World Bank should focus energies on helping complete the ICGLR certification process. Specifically, the World Bank Promines project and/or electronics companies should help digitize the traceability system in Congo, so that data is transparent and automatically shared between government agencies; the U.S. should complete its feasibility study of the IMCA monitoring system as soon as possible; the U.S. and E.U. should urge Rwanda to publish minerals production data as soon as possible; and the E.U. should work closely with the ICGLR to get its natural resources unit up and running quickly, and also possibly aid the technical assistance organizations helping the ICGLR. The ICGLR must define clear portfolios and roles and responsibilities for support staff.

4. The U.S. and E.U. should offer incentives to companies that source certifiably clean minerals from the Great Lakes region and could, for example, issue a high-level award for an end-user company helping build a clean trade and purchasing clean minerals.

5. The U.S. should work with the World Bank to place technical advisors in Congo's government mine regulation agencies, including Centre d'Evaluation, d'Expertise et de Certification, or CEEC; provincial Ministries of Mines; Services d'Assistance et d'Encadrement du Small Scale Mining, or SAESSCAM; and Customs. One hundred advisors in geology, tracking, and customs would go a long way to improving the certification system.

6. The E.U. and other donors should work with the ICGLR to increase communication and coordination among international stakeholders and partners, in conjunction with member state governments, to create a cohesive public education initiative, prioritizing outreach for communities in eastern Congo. This initiative should describe the stakeholders and outline the purpose and significance of the ICGLR RINR framework and the certification scheme.

Background

Trace, audit, certify. This has been the mantra for regional and international efforts to address the issue of conflict minerals in eastern Congo since global advocates, policymakers, and private sector stakeholders started working to combat the destructive trade in 2009. Since then, great progress has been made in addressing the negative elements of the conflict mineral trade as well as the economic drivers of conflict in eastern Congo and the broader Great Lakes Region of Africa. Advocacy movements have raised awareness around the world on a large scale. Soon to be followed by the E.U., policymakers in the U.S. have created frameworks to formalize the trade in the region and create viable markets for clean minerals from the region. The key frameworks include Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and the OECD Due Diligence Guidelines for Responsible Sourcing of Minerals. Private sector actors in the electronics, automotive, aerospace, and retail industries have implemented programs in conjunction with these international schemes to trace supply chains and to audit production facilities. These large companies continue to cooperate with governments and multilateral organizations to create internationally accepted due diligence standards to ensure that minerals used in their respective supply chains are conflict free.

Global progress in promoting a clean minerals market hinges on the Regional Certification Mechanism, or RCM, which has reached a critical juncture. Two ICGLR member states, Rwanda and Congo, are set to begin issuing certifications for mines and exporters under the mechanism, part of the ICGLR Regional Initiative against the exploitation of Natural Resources, or RINR. Two of the most important RINR tools, however, are still not operational. The ICGLR Audit Committee and the Independent Mineral Chain Auditor, or IMCA, have not been appointed. Without them, minerals cannot be credibly certified under the ICGLR scheme or the OECD due diligence standards.

Certification is the most critical component of the entire system. If minerals cannot be certified as conflict-free by international standards, then efforts to trace and audit become moot. Large-scale trade is stymied, and the credibility and viability of the entire system is at risk, jeopardizing peace and stability, access to global markets, and regional economic growth.

The regional certification mechanism is one component of RINR's six-part framework that requires member states to monitor, track, and certify the extraction, transport, and trade of minerals within their own states and the region. These tools consist of:

1. A regional mineral tracking and certification scheme
2. The harmonization of mining legislation in ICGLR member states
3. The creation of a database to track the trade in minerals in the region
4. The formalization of small-scale and artisanal mining
5. The establishment of a whistle-blowing mechanism
6. The promotion of the Extractive Industries Transparency Initiative, or EITI

Comprehensively, this six-part framework is meant to ensure a credible and transparent system to certify Great Lakes minerals for sale and export to global markets. While some of these tools have promisingly advanced beyond the theoretical stage to the initial steps of implementation, critical gaps still remain, within the regional certification mechanism in particular, that could cripple the overall framework. The mechanism was designed to apply internationally accepted due diligence standards to regionally harmonized supply chains using guidance adopted from the ICGLR RINR steering committee.² This guidance was largely based on the OECD/U.N. Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This guidance was adopted by the OECD, international stakeholders, and partner states in the Great Lakes in 2011.³

While the RINR steering committee sets the guidelines for the regional certification mechanism, the actual implementation is largely left up to national governments and therefore varies from state to state. If the state meets general standards, compliance remains valid.

Some ICGLR member states, such as Rwanda and Congo, are considering issuing certificates to some mines and exporters under the regional certification process. Rwanda may soon be certifying three of its largest semi-industrial tin and tungsten mines, Rutongo, Gifurwe, and Nyakabingo. Congo may soon be certifying a handful of controlled tin and tantalum mines, including the Solutions for Hope, Kemet, and Conflict-Free Tin Initiative mines in northern

Katanga and South Kivu provinces.⁴ This certification will indicate compliance within each state under the RCM for mine site validation, chain of custody monitoring, and export control analysis. As the RCM is not yet fully functioning, however, the issuance of such certificates raises a number of questions about the validity of the system’s transparency and accountability mechanisms.

The Audit Committee and the Independent Mineral Chain Auditor are designed to ensure transparency and accountability in the system, but neither unit is operational. Without these two tools operating in tandem, there is no credible institutionalized framework for supply-chain due diligence under either OECD or ICGLR standards. The lack of transparency mechanisms negatively affects mineral extractors, traders, and exporters in member states who seek to increase market access to Western buyers and manufacturers, as full compliance under OECD and the ICGLR RINR, including the RCM is a prerequisite for such access.⁵

International stakeholders and the ICGLR must shift the thrust of conversation about the RCM from certification to compliance. As Rwanda and the Congo begin issuing certificates under the RCM, both member states and international stakeholders must understand that certification is about more than just issuing certificates. There must be compliance with international agreements and commitments made by regional and international stakeholders within the OECD agreement on responsible mineral sourcing and the ICGLR RINR.

Some reforms in Rwanda, others in Congo

As the certification system has taken shape, uneven approaches by the governments of Rwanda and Congo have influenced access to minerals markets.

- **Rwanda** has advanced the “bag and tag” component of certification—the ITRI Supply Chain Initiative, or iTSCi—and now has “bag and tag” processes in place at nearly all of its 400 mines. Rwanda has also conducted government-led mine inspections, but these inspections have not involved independent third parties and civil society, as they have in Congo.
- **Congo** has increased mine inspection efforts, and 55 mines have been validated as conflict-free, or “green,” by teams of government, U.N., local civil society, and NGO representatives. More mine inspections have been done recently and are awaiting approval from Kinshasa. Congo has been far slower when it comes to implementing “bag and tag” systems, however. The tin and tantalum industries organize bagging and tagging at around 100 mines in northern Katanga and a few in South Kivu, but the Congolese government could take a much more proactive stance.

These mixed developments have affected each country’s access to international markets. Rwanda has been able to sell minerals on a fairly large scale thus far, but Congo has not. The Conflict-free Smelter audit program, or CFS, helps electronics, automotive, and other North American and European companies clean their supply chains of conflict minerals, and CFS has accepted the iTSCi “bag and tag” system as a credible way of sourcing minerals from the Great Lakes region. Congo is unable to sell minerals to large companies because it does not have iTSCi, or an

analogous system, at most of its mines. The CFS smelter audit program also accepts ICGLR certification as a way to source minerals, but the certification mechanism remains incomplete.

Without progress on the other components of ICGLR certification, Rwanda may soon face the same situation as Congo. “Bag and tag” systems were an important first step, but companies, governments, and NGOs increasingly recognize that the “bag and tag” systems do not by themselves provide credible assurance of conflict-free minerals. Significant time has passed for Congo, Rwanda, and the ICGLR to implement the remaining parts of the ICGLR certification system, namely the IMCA and ICGLR audits. Unless Rwanda, Congo, and the ICGLR put these parts in place and meet their ICGLR obligations, companies may stop buying many minerals from Rwanda and the region that have only gone through “bag and tag” systems, as they lack the independent checks and balances that full certification provides. To clarify, the bag and tag process has monitoring through risk assessments, but there is no system of uniform penalties for noncompliance. Rwanda, Congo, and the region may then be cut off from mainstream international markets until they take the remaining steps. The interim solution of having consultants perform the functions of the IMCA and Audit Committee are feasible for a handful of mines -- it is impractical for a larger number of artisanal mines, and the consultants will likely not have the ability to perform the tough functions of the IMCA such as sanctioning conflict exporters. Only the ICGLR can perform those functions.

Progress on the Broader Regional Natural Resources Framework

The biggest gap within the RINR framework concerns its first tool, the tracking and certification scheme. ICGLR member states and international stakeholders have begun to put in place elements of the other five tools that have allowed a broader implementation processes to take shape within the ICGLR RINR framework.

Certified Trading Chains

In both Rwanda and Congo, the German Federal Institute for Geosciences and Natural Resources, or BGR, is working with member states to develop actionable certification strategies called Certified Trading Chains, or CTCs, that support individual states’ efforts at certification while adhering to the ICGLR regional certification mechanism. The aim of CTCs is for states to voluntarily commit to increased transparency in tracking and tracing the domestic flow of minerals.⁶ The primary features of the CTCs are methods of verification for mineral origin and a records system for traceability and analysis of trade volume.⁷ The CTC system was created to help artisanal and small-scale mine owners comply with the new regional certification requirements, and it is therefore geared generally towards those sectors. Rwanda has made considerable strides in implementing the CTC system. Pilot projects in Congo’s eastern provinces, however, lag behind considerably but could progress quickly with increased security and political will.⁸

Harmonization of mining legislation

As ICGLR member states begin to move towards validating and certifying mine sites under the ICGLR RINR framework, some have proposed adopting legislation to harmonize mining laws on traceability and mineral certification within the region. Rwanda, for example is the first member state to pass national legislation to operationalize the ICGLR RCM with Ministerial

Regulation no.002/2012/ on March 28, 2012.⁹ In February 2013, the government of Congo passed national legislation that required all mining and minerals trading companies to comply with OECD due diligence guidelines. The law required that the government implement the ICGLR regional certification mechanism nationwide.¹⁰ By implementing these national laws, both Rwanda and Congo have demonstrated a critical commitment to the ICGLR RINR framework and signaled to investors their efforts to mitigate risks and bolster extraction and trade in the region.

Creation of a Regional Database

In accordance with the ICGLR RINR framework, once information being collected under the RCM is finalized, it must then be entered into regional database for monitoring and review. The framework for that database was established in 2011 by the ICGLR in conjunction with the Canadian NGO Partnership Africa Canada, or PAC. Providing necessary information to the ICGLR Regional Database is a requirement for member states under the RINR framework. The database itself can expose anomalies within regional mineral flows and export controls and will ultimately be made accessible to the public via a website.¹¹ So far, some data has been shared by the governments, but this must improve.

Formalization of the Artisanal Mining Sector

The scope and magnitude of the artisanal mining sectors within ICGLR member states, particularly Congo and Rwanda, present one of the most difficult challenges for regional certification. Tracking and tracing mineral extraction, trade, transport, and exportation from numerous artisanal mining sites in the region is a daunting task without structures in place to unite miners, buyers and traders in regional cooperatives. Rwanda is making a major push to formalize its artisanal mining sector and is currently in discussions with a British firm on a plan to completely ban artisanal mining and formalize the entire mining sector within the next five years. The solution is to formalize artisanal mining and bring it fully into the legal, formal trading chain, not to ban it. Congo has made some effort to reform artisanal mining in its eastern provinces. The government has reformed national legislation on mining, created centralized mineral trading centers in large artisanal mining areas, and worked with some external investors to industrialize or semi-industrialize mining operations in certain communities. Progress, however, is slow, and major challenges remain.

Creation of a Whistleblowing Mechanism

In order to provide transparency and promote civil society involvement, the ICGLR RINR created a whistleblowing mechanism for reporting suspicious or nefarious behavior. Within the past year, in conjunction with the German Society for International Cooperation, or GIZ, the mechanism has been implemented in the North and South Kivu provinces of eastern Congo.¹² Civil society actors now have the ability to submit information anonymously about the illegal exploitation or trade of conflict minerals via SMS messaging or through online submission. The whistleblowing mechanism is meant to provide a critical function for the IMCA, but until the IMCA comes online, the usefulness and efficacy of the whistleblowing mechanism will remain in question.

Challenges to Transparency and Accountability

The certification process requires participation by the ICGLR member states, the ICGLR Secretariat, the Audit Committee and the IMCA. Further, the regional certification mechanism can only meet OECD and U.N. due diligence compliance if all these systems work in tandem. Appointing the audit committee and IMCA will complete the components of the system to create a comprehensive certification regime.

Audit Committee

Under the ICGLR certification process, the Audit Committee has three primary functions. The committee certifies third-party auditors who may conduct chain-of-custody audits. The group also reviews audit reports in conjunction with the IMCA for verification of data and compliance with due diligence standards. The audit committee also identifies any suspicious anomalies that arise from the reporting.

Until recently, progress in operationalizing the Audit Committee was all but stalled due to lack of capacity and resources needed to maintain regular communication and coordination among member representatives to the committee.¹³ In order to further the process, a group of independent contractors was hired to work with an Audit Committee advisory group, composed of ICGLR member state stakeholders and partners, to research and draft a report on current gaps and challenges to operationalize the certification scheme. This group presented a draft of their findings at an Audit Committee advisory meeting in Nairobi, Kenya in October 2013. An updated manual for committee operationalization, methodology, and third party audits was also drafted and presented. That draft will be made public when finalized.

Despite the recent progress, however, significant work remains in establishing the technical capacity and political commitment to operationalize the system. For example, the audit committee is tasked with determining whether a regional exporter gets a green, yellow, or red light designation based on chain of custody audits. There had been no approved definition for these designations prior to the recent efforts from ICGLR contractors and the Audit Committee advisory group. There is, furthermore, a severe staffing deficit within the ICGLR. The secretariat in Bujumbura, Burundi, currently only has enough funding for one support staff member for the committee. The secretariat also lacks the funds needed to bring the advisory group together for regular meetings. The group currently meets only twice a year, and both meetings are funded by PAC and BGR. The Audit Committee needs a funding scheme to hire the appropriate staff to ensure coordination and communication, develop a budget, and meet organizational goals.¹⁴

This raises the question of the ICGLR's financial management capacity; as international donors from around the world have promised funding to the ICGLR to help run its programs, but projects remain incomplete. There are concerns about the organization's ability to credibly run these programs at present, which is why feasibility studies will be important in helping decide the most appropriate ways to run programs. It is critical for Rwanda, Congo, and the other ICGLR members to ensure the ICGLR's management systems are fully functional and capable of effectively absorbing donor funding.

The ICGLR Audit Committee has a structure to carry out its mandate, but it lacks a set of approved standards for the methodologies to achieve that mandate. For example, prior to the most recent advisory group meeting in Nairobi, the committee had agreed that it had the mandate to audit regional mineral exporters, but the actual methodology for how to carry out those audits had not been approved by the ICGLR Secretariat and the Audit Committee Advisory Group.¹⁵

Finally, the issue of time and commitment of ICGLR representatives to the Audit Committee and support staff is of significant concern. Most of the members of the committee have more than one other job or duty at the ICGLR and therefore have a limited amount of time they can commit to operationalizing the committee. This creates a need for support staff. Several individuals interviewed for this report stated that there is always significant progress made at the biannual meetings held by the committee advisory group, but little is accomplished between meetings. The ICGLR and its partner organizations must raise and allocate the funds needed and create political incentives for the committee members to work both at and also between meetings in order to speed up implementation.

Many sources familiar with the audit committee were hopeful that the mechanism could be operationalized by next year. The challenge will be to harness the capacity and efficiency of member states while also improving coordination and communication between member states.

Independent monitoring: the IMCA

The Independent Mineral Chain Auditor, or IMCA, was created to be the centerpiece of the certification process' transparency and accountability efforts. This mechanism serves as more of a special investigator than an auditor. The IMCA's role is to monitor and analyze the chain of custody and traceability systems of member states; to follow up on incidents that arise in the inspection and auditing processes; to submit risk assessment reports; and to advise the ICGLR Secretariat on action for noncompliance – i.e. sanctioning noncompliant exporters by taking away their export licenses. It also publishes its reports and assessments on the ICGLR website.

The IMCA complements and reinforces the audit process. For example, a minerals exporter is only responsible for his or her own business and should not be held responsible for government corruption or error. Therefore, if there is corruption or noncompliance in a chain of custody that originates from state or non-state actors, it is imperative that the IMCA act as a special investigative unit to collect and decipher information that might not be available or may be missed in the standard auditing process.

The IMCA is currently the least developed of the tools under the RCM. Its structure, leadership, and mandate lack clarity and definition. The body itself does not yet exist, and questions remain about the political will of Rwanda, Congo, and the ICGLR to staff and operationalize the IMCA. Despite significant international pressure and offers to fund the IMCA since 2011, Rwanda, Congo, and the ICGLR have disappointingly not been able to assemble this critical institution. The IMCA has the power to investigate minerals smuggling and sanction minerals exporters if they are purchasing smuggled minerals or are noncompliant with the certification system. But if the certification system is to have credibility, this function must be part of the process.

Since the IMCA's inception in 2011, the U.S. Agency for International Development, or USAID has promised to provide the financial and technical resources to operationalize the IMCA. However, to date USAID has not funded the IMCA due to legitimate concerns about the ICGLR governance structure as well as the technical and administrative capacity to operationalize the IMCA if funding was released. Before releasing the funds, USAID aims to conduct a study to analyze the risks of attaching the IMCA to the ICGLR Secretariat. This study should be commissioned and completed quickly, and the timeline should be set as soon as possible to facilitate the start of independent monitoring.

Delays stemming from the USAID study present immediate problems for the credibility and functionality of the ICGLR RINR framework in the short-term, when member states are trying to formalize regional trade to boost access to global mineral markets. An interim solution may be necessary. Some stakeholders familiar with the process believe that a short-term independent consultant can play the role of the IMCA. Rwanda, for example, has partnered with Resource Consultancy Services to conduct investigative analysis into its conduct of mine site validation, chain of custody review, and export controls for three of its largest mines. The report of the consultants has been completed and currently rests with the ICGLR and Rwandan government. The report should be published as soon as possible, to increase transparency and confidence in the system.

The IMCA needs the authority and ability to operate and collect information within its mandate from member states. If consultants are to fill this role during a set interim period, they must have the authority to collect all production and export data from member states. Further, if they are able to monitor and analyze traceability within various national chains of custody and find abnormalities they must use that the ability and authority to engage with member states and the ICGLR about the problems and provide guidance for how to correct the misbehavior—also likely to be a very difficult task for an external consultant. Some of this data may be sensitive, so over the long term it is critical that the permanent IMCA be appointed.

Finally, donors should press Congo, Rwanda, and the ICGLR to ensure that representatives appointed to the Audit Committee and IMCA are done so for technical capacity as opposed to political appointment.

Public education at the local level

Member states and international partners have failed to publicly explain the purpose, methodology, and benefits of the ICGLR minerals certification mechanism—especially to communities in eastern Congo. Civil society groups are leading efforts to explain the components of the regional and national certification schemes.¹⁶ In some cases, external groups have attempted to hold workshops or events to publically explain the utility and methodology of various traceability schemes. These groups have generally been short on resources and technical knowledge and not able to reach a fraction of the population necessary to create the popular support or understanding of the regional traceability scheme on the ground.

Those who imposed the certification systems on local communities bear primary responsibility for explaining the processes. There is currently, however, a need for greater communication and

coordination among international stakeholders and partners, in conjunction with member state governments, to provide a single cohesive public education initiative that explains the purpose of the process, who is responsible for it, and why it is important. The entire process thus far has been conceived and carried out as a top to bottom initiative, and now that the theoretical components of certification are approved, in order to implement the process it has to gain support among local communities.

Endnotes

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- ¹² OECD, “Upstream Implementation of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas - Final Report on One-Year Pilot Implementation of the Supplement on Tin, Tantalum, and Tungsten,” January 2013, available at www.ipisresearch.be/download.php?id=398, last accessed November 2013.
- ¹³ Ibid.
- ¹⁴ Author interview with ICGLR representative at the ICGLR Secretariat in Bujumbura, Burundi in October 2013.
- ¹⁵ Author an interview with BGR in Bujumbura, Burundi in October 2013.
- ¹⁶ Author interviews with representatives of Congolese civil society in Gisenyi, Rwanda in October 2013.

Enough is a project of the Center for American Progress to end genocide and crimes against humanity. Founded in 2007, Enough focuses on the crises in Sudan, South Sudan, eastern Congo, and areas affected by the Lord's Resistance Army. Enough conducts intensive field research, develops practical policies to address these crises, and shares sensible tools to empower citizens and groups working for change. To learn more about Enough and what you can do to help, go to www.enoughproject.org.

