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Conflict Economies and Peace Operations

A Case Study on Peace and Security and Development Responses to Conflict Minerals in Eastern DRC

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August 2026

UNU CPR

XCEPT | CROSS-BORDER CONFLICT EVIDENCE / POLICY / TRENDS

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Attribution and funding support

This publication is supported by the Cross-Border Conflict Evidence, Policy and Trends (XCEPT) research programme, funded by UK International Development. XCEPT brings together world-leading experts and local researchers to examine conflict-affected borderlands, how conflicts connect across borders, and the drivers of violent and peaceful behaviour, to inform policies and programmes that support peace. For more information, visit www.xcept-research.org or contact us at info@xcept-research.org.

About the authors and acknowledgements

The four authors are senior and junior researchers at United Nations University Centre for Policy Research (UNU-CPR), which is a research institute within the United Nations that carries out policy-focused research and capacity-building on issues of strategic interest and importance to the UN and its Member States. Dr. Erica Gaston leads the Conflict Prevention and Sustaining Peace pillar; Dr. Nicole Goldin leads the Equitable Development pillar; Catharina Nickel is a Peace Operations Fellow at UNU-CPR; and Rebecca Hinkhouse is a junior programme associate in the Conflict Prevention and Sustaining Peace pillar.

The authors would also like to thank Jack Durrell for tremendous communications support, the team at XCEPT for their feedback and review, the peer reviewers for their expertise and brainstorming, and Kayla Ermanni for research support.

ISBN: 978-92-808-6674-2

Citation: Erica Gaston, Nicole Goldin, Catharina Nickel and Rebecca Hinkhouse, *Conflict Economies and Peace Operations: A Case Study on Peace and Security and Development Responses to Conflict Minerals in Eastern DRC* (New York, United Nations University, 2026).

Executive Summary

Competition for control of eastern Democratic Republic of Congo (DRC)'s vast mineral wealth lies at the heart of one of Africa's most persistent and internationally consequential conflicts. The takeover of large parts of eastern DRC by the non-State armed group March 23 Movement (M23) in early 2025, its use of proceeds from mineral rich areas, and how this connected to foreign support and involvement has renewed attention on the role of natural resources in incentivizing and helping to fund cycles of violence in eastern DRC.[1] While the complexity of conflict in eastern DRC cannot be reduced to competition over minerals alone, control over mineral-rich territory, trade routes and cross-border exports has been intertwined with cycles of conflict and armed group mobilization for decades.

Since 2000, the United Nations (UN) Security Council has recognized the link between the illicit exploitation of and trade in natural resources and conflict in eastern DRC and the broader region. In recognition of this link, the two successive peacekeeping operations in the DRC, the United Nations Mission in the Democratic Republic of the Congo (MONUC) (1999–2010) and the United Nations Organization Stabilization Mission in the Democratic Republic of the Congo (MONUSCO) (2010–present), as well as the Office of the Special Envoy for the Great Lakes Region (OSE-GL), created in 2013, have been assigned a range of tasks designed to address the link between armed group support and mobilization and the illicit exploitation of and trade in natural resources. Beyond these UN missions, bilateral donors, international financial institutions, development entities and private sector actors have supported a number of economic or development initiatives and mechanisms related to conflict minerals issues, ranging from due diligence and responsible sourcing initiatives to mine site development and alternative livelihoods initiatives. The research asks:

- How have these different peacekeeping, diplomatic, private sector and development initiatives sought to address the role of natural resources as conflict drivers? How have these different initiatives and efforts complemented each other in practice?
- What does the record of these peace and security on one hand, and development initiatives on the other, suggest for future peace interventions or other efforts to address regional conflict economies?

This paper examines these research questions by exploring a number of both development and peace and security-related initiatives in the eastern DRC and the broader Great Lakes region. This contributes to a broader research initiative exploring policy responses to cross-border or borderland sources of conflict supported by the Cross-Border Conflict, Evidence, Policy and Trends (XCEPT) programme.[2] The principal types of initiatives considered are summarized in the chart below.

Development and private sector responses	**Peace and security responses**
Responsible sourcing and supply chain governance • Due diligence and responsible sourcing standards • Traceability initiatives (e.g. the International Tin Supply Chain Initiative) • Regional certification mechanisms (e.g. the International Conference on the Great Lakes Region Regional Certification Mechanism (RCM))	Peacekeeping responses to armed group control and conflict financing • Security and stabilization operations around mine sites and key transport routes • Disruption and interdiction of armed group control and exploitation of natural resources • Joint initiatives addressing the crime–conflict nexus • Quick-impact projects and other stabilization initiatives • Support to mine site validation and traceability
Artisanal and small-scale mining (ASM) governance • Formalization of ASM • Mine site governance initiatives	Diplomacy, governance and regional cooperation • Good offices engagement in DRC, including support for domestic regulation and legal reform

• Licensing, inspection and regulatory oversight	• Regional cooperation frameworks, including support for harmonizing policies and regulatory approaches
Community resilience and livelihoods • Alternative livelihood programmes • Community-based interventions in mining areas	Sanctions and monitoring • UN sanctions regime listing criteria and designations • Security Council-mandated monitoring mechanisms (Panel of Experts; Group of Experts)

Examining these different initiatives yielded the following key findings on responding to conflict economies:

- **Past responsible sourcing initiatives have offered proof of concept that coordinated development and private sector pathways can limit armed groups' ability to profit from conflict minerals.** When effectively designed and robustly implemented, traceability, due diligence and certification initiatives can close some of the pathways through which armed groups profit from illicit exploitation and trade in natural resources.
- **However, implementation, security and governance constraints have prevented responsible sourcing initiatives from delivering on this potential at scale.** Slow and uneven implementation of validation, traceability and regulatory processes, limited participation and engagement by miners, traders and broader financial partners, and insufficient attention to community and livelihood needs have constrained their reach and effectiveness. More fundamentally, these initiatives depend on a minimum level of security, enforcement and political commitment, including cooperation by neighbouring States – conditions that are largely absent in eastern DRC and the Great Lakes region.
- **Development progress and due diligence compliance do not automatically translate into conflict prevention.** As a result of these gaps, initiatives could succeed from a development perspective – successfully validating a mine and enabling formal, certified exports – while leaving paths for conflict financing intact. Armed groups adapted by moving to other sites and trade routes, exploiting porous borders and cross-border arbitrage to sustain regional conflict economies.
- **These constraints point to an important potential complementarity between development approaches and peace and security tools.** Many of the challenges that constrain responsible sourcing initiatives – insecurity, weak governance and regulatory systems, political obstacles and limited regional cooperation – are issues that peace operations and other peace and security tools are commonly designed to address.
- **Peacekeeping operations have more to offer on conflict economies than is commonly recognized, but lack of prioritization limited meaningful effects.** MONUC and MONUSCO supported mine site validation and regulatory reforms, helped to disrupt armed group capture of illicit natural resource chains, and provided broader support to development actors and responsible sourcing initiatives. However, these contributions were often undertaken incidental to other priority tasks, rather than being designed and taken forward for strategic effect. Even where mandates enabled more active engagement, interventions were episodic, geographically limited and insufficiently sustained to reshape entrenched systems of armed group control and illicit trade.
- **Conflict economies cannot be treated as technical governance or regulatory challenges alone.** While responses to illicit exploitation and trade sometimes figured in the mandates, these were one task among many and often delegated to technical reporting or regulatory engagement measures alone. Because conflict economies are fundamentally political systems that distribute power, revenue and influence, disrupting them requires sustained political prioritization rather than treating them as a peripheral component of stabilization or development programming.
- **Better coordination alone will not produce integrated responses.** Contrary to standard assumptions, more cooperation and integration frameworks will not resolve the disjuncture between peacekeeping operations, United Nations Country Teams (UN CTs) and other development actors in responding to conflict-economy issues; fundamentally different mandates, incentives, objectives and time horizons undermine their ability to undertake responses to conflict economies as a shared strategic priority.

- **International interventions cannot substitute for political will.** Whether supporting responsible sourcing, strengthening regulation, disrupting armed group financing or advancing regional cooperation, international actors depended on national and regional partners willing to undertake reforms and cooperate across borders. As one former UN official observed, these initiatives ultimately require "a willing partner on the other side".[3]
- **Regional conflict economies consistently outstrip State-based responses.** Mineral supply chains, armed groups and commercial incentives operate across borders, yet most peacekeeping mandates, development programmes and regulatory initiatives remain bounded by national jurisdictions.

This last key finding highlights a broader challenge for peace and security strategies. Environmental exploitation, trafficking networks and resource extraction cut across political, security and development domains while also transcending national borders. Yet the international system still lacks institutions or mechanisms specifically designed to engage regional political economies as integrated systems. The range of mechanisms discussed – from peace operations to sanctions, to development initiatives and programmes – tended to be designed for and operated within designated national territorial boundaries. Those with a more regional focus were repeatedly constrained by sovereign prerogatives, political caveats or limited resourcing, which prevented them from acting in a genuinely transnational manner. Future peace interventions will therefore need to look more to models or mechanisms that can operate across regional political, security and development systems, rather than within the national and sectoral silos through which international responses have traditionally evolved.

Future Directions and Recommendations

These findings have a number of policy implications, both immediately for the current peace process and ceasefire implementation discussions in the DRC, and for those considering future models for peace operations or other peace interventions and potential responses to regional conflict-economy dynamics.

For those working on the current peace process, this report underlines that across multiple previous cycles of conflict in eastern DRC, military disengagement and ceasefire arrangements have proven unable to produce durable peace while the underlying conflict-financing systems remained intact. This suggests a few immediate and mid-term areas for attention:

- **Embed conflict-economy triggers in ceasefire design and implementation.** As the parties operationalize the Doha Framework and the monitoring of the ceasefire terms, conflict drivers related to natural resources must be explicitly identified and built into the terms, interim security arrangements and monitoring mechanisms, including the mandate and operating modalities of the Expanded Joint Verification Mechanism Plus (EJVM+).
- **Use implementation of the Regional Economic Integration Framework (REIF) to operationalize a long-term strategy for transforming the conflict economy.** Many of the tools and approaches highlighted in this report – including responsible sourcing, mining governance, regulatory reform and development initiatives – could provide important building blocks for implementing many of the REIF's commitments. The current peace process and the REIF offer an opportunity to revive the best of these past approaches, but these should be oriented around more of a long-term vision of how to use them jointly to prevent conflict recurrence and economic growth.
- **Review whether UN mechanisms are equipped to support implementation of the peace agreement.** This should include an assessment of whether MONUSCO's mandate and resources, as well as the mandate and structure of the OSE-GL, are sufficient to support some of the measures outlined above and to address some of the broader conflict-financing dynamics in the DRC and the region.
- **Reinvigorate the International Conference on the Great Lakes Region's conflict minerals architecture.** Renew political, technical and financial support for the Regional Initiative against the Illegal Exploitation of Natural Resources, regional certification systems and cross-border investigative and oversight mechanisms.
- **Lay the groundwork for longer-term conflict minerals responses.** Those involved in the peace process should begin identifying the institutional, governance and development measures that can be initiated during the current implementation phase to begin tackling the way that illicit natural resources trade and exploitation undergirds

conflict-financing systems, ranging from considering conflict-economy incentives in designing the next stages of disarmament, demobilization and reintegration, and stabilization strategies, to supporting more cross-border programming and research related to conflict minerals issues.

For those working on some of the broader policy areas that this study touches upon, in particular those engaged in the debate surrounding the future of peace operations, the MONUSCO experience underscores the importance of considering how peace operations might be better structured and resourced to address transnational and cross-border conflict economies. Several points for consideration emerge from the study for those involved in peace operations design, management and support:

- **Recognize regional conflict economies as a core peace operations challenge.** Where regional political economies are identified as strategic conflict drivers, missions should be explicitly mandated, resourced and politically supported to address them, with sufficient prioritization to match the scale and strategic importance of these dynamics.
- **Strengthen institutional learning on peace operations responses to conflict economies.** Better document, evaluate and disseminate lessons from past missions, including MONUC and MONUSCO, while placing greater emphasis on assessing strategic impact – including effects on conflict dynamics, governance and armed group financing – rather than primarily measuring outputs and activities.
- **Move beyond coordination frameworks to strengthen integration between the mission and the UN CT responses.** Stronger cooperation between peace operations and UN CTs is important, but genuine integration requires shared strategic priorities, not better coordination mechanisms or Integrated Strategic Frameworks.
- **In considering new models and "modular" approaches for peace operations, ensure that they retain the political capacities needed to address regional conflict economies.** Technical and specialized capabilities should complement – not replace – the political, security and good offices functions required to address the underlying drivers of conflict.

For development actors and the private sector, this study suggests building on the substantial progress made through responsible sourcing initiatives over the past decade, while broadening these approaches beyond mine site governance to address regional incentive structures, cross-border supply chains and the economic realities facing miners and affected communities. The current peace process presents a rare opportunity to integrate these approaches into a broader strategy that advances both economic growth and development aims, while also reducing the risk of enabling conflict and abuses. Several recommendations emerged from this study's review of past practice that might guide future programming:

- **Pair new investment with responsible sourcing and due diligence.** As the peace process creates new opportunities for investment in the mining sector, comparable attention and resources should be devoted to responsible sourcing, due diligence and conflict-sensitive business practices to avoid reinforcing the conflict dynamics that threaten long-term stability.
- **Address barriers and strengthen incentives toward responsibly sourced minerals.** Formalization and responsible sourcing initiatives should focus more on addressing the practical disadvantages of formal markets, working with governments, financial institutions and commercial buyers to address liquidity and pre-financing constraints, ensure reliable payments and generate more accessible and faster administrative procedures.
- **Design responsible sourcing around the realities facing miners and communities.** Formalization and responsible sourcing initiatives should place greater emphasis on improving mining conditions, supporting realistic livelihood transitions, and ensuring meaningful community participation, grievance mechanisms and tangible local benefits.

Contents

List of Acronyms

3Ts	Tin, Tantalum, and Tungsten
ASM	Artisanal and small-scale mining
DDRRR	Disarmament, demobilization, repatriation, resettlement and reintegration
DRC	Democratic Republic of Congo
ÉLAN RDC	Élan République démocratique du Congo
FARDC	Forces armées de la République démocratique du Congo
FDLR	Forces démocratiques de libération du Rwanda
FIB	Force Intervention Brigade
ICGLR	International Conference on the Great Lakes Region
IOM	International Organization for Migration
ISF	Integrated Strategic Framework
ISSSS	International Security and Stabilisation Support Strategy
iTSCi	International Tin Supply Chain Initiative
LBMA	London Bullion Market Association
M23	March 23 Movement
MONUC	United Nations Organization Mission in the Democratic Republic of the Congo
MONUSCO	United Nations Organization Stabilization Mission in the Democratic Republic of the Congo
NDC-R	Nduma Défense du Congo-Rénové
NGO	Non-governmental organization
OECD	Organisation for Economic Co-operation and Development
OSE-GL	Office of the Special Envoy for the Great Lakes Region
PoC	Protection of civilians
PRG	Project on Resources and Governance
PROMINES	Growth with Governance in the Mineral Sector Project
PSC	Peace, Security and Cooperation (Framework)
RCM	Regional Certification Mechanism
RINR	Regional Initiative against the Illegal Exploitation of Natural Resources
SPM	Special political mission
SRSG	Special Representative of the Secretary-General
UN	United Nations
UN CT	United Nations Country Team
UNDP	United Nations Development Programme
UNECA	United Nations Economic Commission for Africa
UNSDCF	United Nations Sustainable Development Cooperation Framework
USAID	United States Agency for International Development
ZEAs	Zones d'exploitation artisanale

I. Introduction

Conflict minerals are front and centre in the eastern Democratic Republic of Congo (DRC)'s conflict dynamics again. In January 2025, the March 23 Movement (M23) seized substantial territory in the country's east, including the major city of Goma, consolidating its hold over much of North Kivu province, including the strategic mineral-rich town of Rubaya, a major tantalum mining site, and the Bisie tin mine in Walikale territory.[4] Through further advances in February and March, M23 forces took control of South Kivu province, including Nyabibwe, a major tin and gold hub.[5] While the complexity of conflict in eastern DRC cannot be reduced to competition over minerals alone, control over mineral-rich territory, trading routes and cross-border export networks has repeatedly shaped both armed group strategies and regional intervention, including Rwanda's longstanding interest in eastern DRC and its alleged support to M23.[6] The 2025 peace process between Rwanda and DRC, brokered by the United States with Qatari and regional facilitation,[7] in a sense reflected recognition that these underlying economic dynamics could not be separated from the broader security settlement. The Washington Accord between the DRC and Rwanda comprised two core agreements: the first (agreed in June 2025) was focused on peace and security issues, including ceasefire arrangements, cessation of support to armed groups and the restoration of Congolese State authority in M23-held areas; the second (signed in December 2025) was a Regional Economic Integration Framework (REIF). This REIF and three other bilateral agreements between the United States and DRC, and the United States and Rwanda focused heavily on regional investment and access to eastern DRC's mineral sector.[8]

While the M23 crisis has refocused attention on the nexus between DRC's mineral wealth and broader regional conflict drivers, this is not a new dynamic. Repeatedly over the last two decades (if not well before) illicit exploitation and export of minerals have fuelled local conflict dynamics in eastern DRC, deepened eastern borderland communities' grievances, and incentivized external (armed) intervention in the DRC by both State and non-State actors.[9] As early as 2000, the Security Council expressed its deep concern at the way that "illegal exploitation of natural resources" was contributing to the DRC conflict context.[10] Nearly all of the Security Council-mandated peace and security mechanisms or entities since that time have had some scope in their mandate, reporting or functions to respond to this nexus between criminality, conflict and the illegal exploitation of natural resources. This includes mandate language and functions of two UN peacekeeping missions – the Mission of the United Nations in the Democratic Republic of the Congo (MONUC) (1999–2010) and the United Nations Organization Stabilization Mission in the Democratic Republic of the Congo (MONUSCO) (2010–present)[11] – and a regional special political mission, as well as in criteria and direction of the United Nations (UN) sanctions regime and reporting bodies linked to it.

The extent to which natural resource issues have been incorporated into the mandates and functions of these peace and security mechanisms is itself unusual. Responding to political-economy issues like conflict minerals is not a common feature of UN peacekeeping mandates.[12] Nor, some would argue, should it be. As one former MONUSCO staff member observed, addressing illicit economies, "touches on much broader economic issues – questions of transparency, governance, the pathway to industrialization … It begs the question, what is a peacekeeping mission supposed to do about this? It starts to become development territory… something that the Country Team or other specialist agencies might have more to do with."[13]

Addressing conflict minerals and illicit economies, "touches on much broader economic issues – questions of transparency, governance, the pathway to industrialization … It begs the question, what is a peacekeeping mission supposed to do about this?" – former MONUSCO staff member.

Such comments reflect a broader assumption about a core division of labour that is built into the UN architecture. UN peacekeeping missions (including MONUSCO) operate alongside, and are formally integrated with, UN Country Teams (UN CTs), comprising UN agencies, funds and programmes that bring more development-oriented mandates, approaches and capacities. A series of UN reforms and integrated planning processes have sought to improve coordination and strategic alignment between peace operations and the UN CT, including in the DRC.[14] Where there are strong underlying economic drivers or root causes of conflict, there is an implicit assumption that these might be dealt with by these economic or development actors, allowing peacekeeping missions to focus more on the security or political aspects. In addition to these UN entities, there is a much broader ecosystem of development, governance and private sector initiatives operating in eastern DRC.

This paper considers how this presumed division of labour functions in practice, exploring how development actors (including but not limited to those within the UN CT) on one hand, and MONUSCO and other Security Council-mandated bodies or mechanisms on the other, have sought to respond to conflict minerals issues in the DRC. It asks:

- How have development actors approached conflict minerals and other illicit natural resource trafficking issues in eastern DRC and what, if any, do they perceive as the contribution of MONUSCO to those efforts?
- How has MONUSCO taken forward its mandate on addressing the linkage between armed groups, conflict triggers and the illicit exploitation of natural resources, either through its own operations or in partnership with other actors (the UN CT, those working with the UN sanctions regime, the Special Envoy for the Great Lakes or other regional actors)?
- Does the theory of a complementary division of labour between development, peacekeeping and peacebuilding actors appear to have resulted in some concerted responses? If not, what are some of the obstacles or challenges to more concerted and integrated peace and security and development responses?

In considering these questions, the paper will also reflect on some of the larger challenges faced by both development actors and MONUSCO in addressing conflict minerals issues in the DRC.

This paper is part of a broader research initiative of the United Nations University Centre for Policy Research, supported by the XCEPT research programme,[15] which explores how peace operations have engaged with borderland and cross-border conflict dynamics, with a view to informing future models of peace interventions. This paper contributes to the larger research study in several ways. First, it provides another example of how peace operations have responded to particular borderland or cross-border-related conflict drivers, in this case the conflict economies surrounding natural resources in eastern DRC. These have both had specific impacts in borderland areas of DRC and connect to larger regional conflict drivers. Second, the larger research project is intended to inform ongoing debates about future models of peace operations – including those that recommend moving away from large, multidimensional missions to more bespoke or “modular” design of missions.[16] By examining the division of labour between the peacekeeping mission and the UN CT or other development actors, this research paper may help explore some of the promise or challenges of those approaches. Third, exploitation and trafficking of natural resources has long been a key driver of conflict in eastern DRC and the broader region, and has been at the crux of the re-emergence of major fighting and inter-State disputes since late 2024. This makes capturing some of the efforts to address conflict minerals, from both peacebuilding and development actors, all the more critical at this moment.

Methodologically, this paper draws on desk research from UN studies, appraisals of development reports, academic literature on both conflict dynamics and development and natural resources issues in the DRC, and other policy and journalistic coverage of these issues. It was also informed by 36 semi-structured key informant interviews, including with development practitioners, policymakers, former and current members of the UN mission, members of the UN CT, sanctions experts, experts on natural resources issues, and others.

The first background chapter offers a brief introduction to how conflict economies related to minerals and other natural resources have emerged in eastern DRC, and their connection to the current conflict context. The second chapter will delve into some of the development approaches and frameworks set up to respond to conflict minerals issues in eastern DRC, with a focus on the supply chain, transparent sourcing and formalization interventions. The third chapter explores how peace operations, in particular MONUSCO, have taken forward responses to illicit use of natural resources, in cooperation with other actors, including the Group of Experts linked to the UN sanctions regime, the Office of the Special Envoy for the Great Lakes region (OSE-GL) and the UN CT. The concluding chapter reflects on this learning to assess how these peacekeeping, development and other policy tools complement each other in practice, and what lessons this might suggest for future models of peace operations or other means of addressing cross-border conflict economies. An Annex provides a table offering an overview of patterns in Security Council resolutions since 2004 related to natural resources issues in the DRC. It highlights how MONUSCO tasks related to natural resources have shifted, as well as recurring or notable recommendations vis-à-vis other actors.

Background on Natural Resource-Linked Conflict Economies in Eastern DRC

The geography of the DRC's mineral wealth maps onto distinct political economies of extraction, which in turn contribute to different conflict, governance and geopolitical dynamics. The country's largest copper, cobalt and lithium deposits – which have become increasingly important to global battery and renewable energy supply chains – are concentrated in the south-eastern provinces of Haut-Katanga and Lualaba (copper and cobalt) and Tanganyika (lithium).[17] There are also significant deposits of critical minerals in eastern DRC, in particular the 3Ts (tin, tantalum and tungsten), which are essential for electronics (including semiconductors) and aerospace and defence applications, as well as substantial gold deposits. Yet differences in the scale of deposits, their value (in relation to weight), the technologies and investment it takes to extract them, and broader global supply chain incentives have produced very different political economies of extraction in the south-east compared to eastern DRC. In the south-eastern provinces, copper and cobalt extraction is primarily organized via large-scale concessions linked to major industrial infrastructure and corporate investment.[18] By contrast, eastern DRC’s gold and 3T sectors are marked by extensive artisanal and small-scale mining (ASM), involving hundreds of thousands of miners selling minerals through long chains of local traders and exporters rather than exporting via a small number of industrial operators (see box A below on other differences that make gold more susceptible to cross-border smuggling). This creates a very different regulatory environment, with greater opportunities for informal taxation, illicit extraction and mineral exports to serve as channels of conflict financing in eastern DRC.

The differing scale, value and geographic distribution of the DRC’s mineral wealth create distinct political and economic incentives among Congolese and regional actors. More than 70 per cent of global cobalt extraction takes place in the DRC, giving it significant influence over global supply and pricing.[19] As one expert offered, when it comes to something like Cobalt, the DRC is a “price maker, not a price taker”.[20] Revenues from the country’s large-scale copper and cobalt sectors, concentrated primarily in the south-east, are correspondingly far greater than those generated by the predominantly artisanal mining economies of eastern DRC. For the Government in Kinshasa, instability in eastern DRC poses significant humanitarian and security challenges, but comparatively less threat to the State’s core revenue base. The physical distance – with eastern DRC’s largest city, Goma, some 1500 kilometres away on the other side of the country from Kinshasa, the capital of DRC – has also meant the region tends to be dealt with politically as a peripheral area or buffer zone.[21] By contrast, for many political, military and commercial actors in neighbouring Rwanda and Uganda, eastern DRC has long represented an important market and zone of cross-border commerce. Minerals have formed a central component of these regional trade networks, alongside timber, charcoal and other commodities. For Rwanda and Uganda, this has created sustained economic interests in eastern Congo’s borderlands, in addition to the substantial political and security interests in these areas.[22]

For many rural households in eastern DRC, artisanal mining represents a necessary livelihood strategy. The sector employs hundreds of thousands and supports the livelihoods of several million people.[23] This reflects not only the value of the minerals themselves, but also that the insecurity, displacement, insecure land tenure and poor market access prevalent in eastern DRC have undermined agricultural production and other economic opportunities. Yet while minerals are an economic lifeline within a fragile region, they are also an underlying driver of that instability, with those same mineral

Box A: Gold as a Particularly Susceptible Cross-Border Trading Commodity

Much of the media coverage and reporting connecting illegal mineral exploitation and export with armed group support have focused on gold smuggling. Specific to the DRC, successive UN Group of Experts reports have repeatedly highlighted the central role of gold in financing armed groups and criminal networks.[29] During and following the 2024 escalation of the conflict between the DRC Government and the Rwandan-backed M23, many analysts have highlighted the gap between Rwanda's domestic gold production and its official export numbers, suggesting strong indicators of illegal export of gold (among other minerals) smuggled across the DRC's borders.[30]

Gold poses distinct cross-border governance challenges relative to other 3T minerals. Artisanal gold's high value-to-weight ratio – a pocketful of gold can be worth as much as an entire truckload of lower-value minerals – makes it especially susceptible to cross-border laundering and smuggling.[31] A trader can transport a very large value of gold in a pocket or small bag, whereas moving an equivalent value of tin or tungsten would require transporting substantially larger quantities that are far more difficult to conceal. Gold is also more difficult to formalize because extraction is dispersed across large numbers of artisanal mining sites spread across a vast and often inaccessible area, making particular mine sites harder to identify and regulate. By comparison much of the 3T minerals sector has historically been organized around more established cooperatives and mining sites, which are easier to identify, monitor and connect to formal supply chains and sources of financing.[32]

economies substantially financing armed groups and incentivizing intervention in eastern DRC for decades. In 1999, the DRC, Rwanda, Uganda and other major parties signed the Lusaka Ceasefire Agreement[24] establishing commitments on ceasefire, withdrawal and disarmament, as well as a roadmap for ending the Second Congo War. Yet already by 2001, the UN Panel of Experts on the Illegal Exploitation of Natural Resources and Other Forms of Wealth of the DRC began documenting how systematic networks of illicit natural resources extraction and export were undermining the agreement and fuelling continued fighting and foreign interference in eastern DRC.[25] The Panel's reports documented that rebel armed groups were deeply involved in systems of extraction, taxation and commercialization involving coltan, timber, diamonds and other natural resources in areas under their control.[26] However, according to the Panel's reporting, the ultimate beneficiaries lay beyond DRC's borders, with revenues from these systems benefiting Rwanda's military and increasing Uganda's defence budget.[27] By 2003, the Panel concluded that although foreign armies had withdrawn from eastern DRC, criminal actors and armed groups linked to Rwanda, Uganda and Zimbabwe, as well as those linked to the DRC Government, had generated a "self-financing war economy centred on mineral exploitation" that meant that those groups would never disband voluntarily.[28]

Once embedded in the landscape of DRC, these conflict economies have continued to fuel armed group activities and conflict. Throughout the mid-2000s and 2010s, the Group of Experts (established in 2004 with the UN sanctions regime for the DRC)[33] repeatedly documented that armed groups in eastern DRC continued to finance operations through control of artisanal mining sites, taxation of traders and cross-border smuggling networks. By 2016 gold was "by far the mineral most used to finance armed elements and criminal networks".[34] Armed movements such as the Forces démocratiques de libération du Rwanda (FDLR), various Mai-Mai factions and other local militias were involved "in the illegal taxation and exploitation of natural resources", particularly gold, and to a lesser extent, 3T minerals, including through the control of mine sites in North and South Kivu and Ituri.[35] While such reporting has frequently documented supply lines extending outside of DRC and benefiting external State actors (notably Rwanda, though it denies involvement),[36] armed groups linked to the DRC Government have also participated in this pattern of local exploitation and extraction. In addition, independent studies have identified DRC's armed forces, the Forces armées de la République démocratique du Congo (FARDC), as the single largest interferer across surveyed mine sites.[37]

These conflict economies have never been sustained by armed actors alone. The extraction, transport and export of minerals depend on networks of traders, exporters and commercial intermediaries that connect mine sites in eastern DRC to regional and global markets. Analyses of the persistence of conflict minerals have therefore pointed not only to the role of State and non-State armed actors, but also to commercial interests operating at local, regional and international levels, including actors linked to the international extractive industry.[38]

Natural resources tensions are not only linked to armed group financing and exploitation. They are also connected to longstanding disputes over land, livelihoods and the distribution of economic benefits that represent tensions between eastern DRC and the political centre. Minerals-driven conflict in the DRC is compounded by longstanding grievances among artisanal miners and local communities that stem in large part from how the central Government grants mineral extraction rights and manages access to mining areas.[39] Artisanal miners frequently lack legal access to lands they have worked for generations because industrial mining licenses often cover virtually all areas with known mineral deposits. This leaves little or no space for designated artisanal mining zones (Zones d'Exploitation Artisanale, ZEAs) – a key requirement for legal artisanal activity – thereby forcing many to work informally or outside the law and exposing them to insecurity and exploitation. Weak rule of law, inadequate recognition of customary land rights, absence of meaningful consultation or informed consent for affected communities, and a lack of transparency in decision-making further contribute to perceptions that the central Government favours State and corporate interests at the expense of miners' rights and community well-being.[40] The resulting sense of exclusion and economic marginalization has fuelled local disputes over access to mineral resources and provides fertile ground for anti-State mobilization and armed group recruitment in parts of eastern DRC.[41]

While the relationship between illicit natural resource exploitation and conflict has been documented continuously since the early 2000s (if not earlier), international attention to the issue reached a high point in the early-to-mid 2010s. This reflected new regulatory and market pressures that prompted greater attention to mineral traceability, supply-chain governance and due diligence initiatives (discussed in chapter 2), but also the 2012 M23 crisis, during which the group captured large parts of eastern DRC. Although the crisis itself was not principally driven by competition over minerals, the conflict and subsequent efforts to neutralize armed groups led to renewed attention on how conflict minerals and other illicit natural resources trade contributed to the financing and strength of a number of armed groups in eastern DRC.

Given this background, it is perhaps not surprising that questions of mineral exploitation and cross-border support have again figured prominently in the most recent outbreak of conflict in eastern DRC – arguably the largest recurrence of internationalized armed conflict in the DRC since the Second Congo War. Although global attention focused on the situation only with the fall of Goma in January 2025, M23 had been expanding its territorial control over key supply routes in parts of North Kivu since early 2024. By mid-2024, the group had seized control of the town of Rubaya and its surrounding coltan mines, allowing them to generate revenues of at least $800,000 per month through the taxation of mineral production and trade, according to 2024 estimates.[42] By 2026, expanded production and consolidation of control over certain trade routes led to a revised UN estimate that the group was earning $1 million per month from illicit mining and smuggling.[43] Since 2024, the UN Group of Experts has reported unprecedented levels of coltan and other 3T smuggling from the Rubaya area into Rwanda, where minerals are allegedly mixed with domestic production and then enter downstream supply chains. Rwanda denies the allegations.[44]

With this background on how mineral resource extraction and export connects to conflict drivers, it is now possible to turn to some of the initiatives that have been undertaken to try to address conflict minerals in eastern DRC, first by development actors (chapter 2) and then by MONUSCO and other Security Council-mandated actors and mechanisms (chapter 3).

II. Development Responses to Conflict Minerals: Responsible Sourcing, Formalization and Livelihood Support

Beginning in the early 2000s, first through a UN Panel of Experts on the Illegal Exploitation of Natural Resources,[45] and later through the UN Group of Experts, reports documented how the extraction, trade and export of 3T minerals and gold from eastern DRC were contributing to armed group financing and conflict dynamics.[46] Gradually these reports started to galvanize greater policy attention to the way that natural resources markets were financing conflict and enabling human rights abuses in eastern DRC. In 2010, the United States Congress included a provision of the Dodd-Frank Wall Street Reform and Consumer Protection Act (section 1502) that created a due diligence reporting obligation to the Securities and Exchange Commission for companies to disclose whether tin, tungsten, tantalum and gold used in their products originated in DRC or neighbouring countries and, where applicable, to report on the steps taken to investigate the origin and movement of those minerals through their supply chains.[47] Additionally, in 2010, at the Security Council's request, the Group of Experts came up with a set of due diligence guidelines to be used by importers, processing industries and consumers of mineral products in relation to the purchase, sourcing and processing of minerals from the DRC.[48] The Security Council subsequently called upon all States to raise awareness of these due diligence guidelines, and incorporated consideration for them into the DRC sanctions regime.[49] In 2011, the Organisation for Economic Co-operation and Development (OECD) adopted its Due Diligence Guidance for Responsible Supply Chains of Minerals, establishing a five-step framework that both public and private sector due diligence schemes would later use as the basis for certification standards and processes.[50]

These policy statements and regulatory measures created increasing pressure to ensure that minerals sourced from the Great Lakes did not support armed groups or contribute to human rights violations. They have generated a wide range of responses from governments, the private sector and development organizations (both UN and non-UN), in particular related to traceability, certification and supply-chain verification initiatives.[51] This chapter will focus on a particular set of interventions that rose to prominence in the 2010s as the key cross-border economic and regulatory response to conflict minerals in eastern DRC – a broad family of what might be characterized as "responsible sourcing" initiatives aimed at creating verifiable conflict-free mineral supply chains.[52] Responsible sourcing initiatives were explicitly designed to address the cross-border dimensions of the conflict minerals economy, including the smuggling, export, commercialization and international sourcing of minerals originating in eastern DRC. They combined efforts to formalize and improve conditions and economic opportunities at (largely illegal or unregistered) ASM sites, with regional or global traceability and supply chain verification measures.

The Emergence of Traceability, Certification and Due Diligence Initiatives

Traceability, certification and due diligence initiatives have generally sought to establish certified or verifiable chains of custody for minerals moving from mine sites to international markets, while also creating mechanisms to identify and exclude minerals linked to conflict actors or illicit trading networks. Two key initiatives, one led by the private sector and one the product of regional Member States' cooperation, illustrate some of the broad trends in these traceability and certification initiatives. Both of these initiatives have operated in conjunction with broader initiatives to formalize and create greater oversight over so-called informal or artisanal mine sites. Each will be discussed in turn followed by some challenges in implementation and design that have surfaced within these approaches.

Box B: Key Definitions

Formalization refers to the process of bringing ASM and associated mineral trading activities under the legal, regulatory and institutional oversight of the State. In the conflict minerals context, this can involve: legal licensing of miners, traders and cooperatives; establishing State oversight and taxation schemes; introducing labour and environmental standards.

Traceability (informally known as “bag and tag”) is the ability to track minerals from the point of extraction through the supply chain or chain of custody to export, processing and final markets. It can facilitate formalization processes and also be a way to ensure due diligence compliance with regulatory standards (including those unrelated to local conflict dynamics). Traceability initiatives aim to provide verifiable information about mineral origin and custody so that private sector companies can identify (and in theory, cease sourcing) minerals linked to armed group involvement, human rights abuses or fraud and smuggling.

Certification refers to a formal attestation that minerals, mine sites or supply chains meet specified responsible-sourcing standards. While certification usually refers to attestation by a government, regional body or other regulatory authority, industry certifications also exist.

Mine site validation is part of a regulatory or oversight process indicating that a mine meets the designated standards (in the context of this paper, typically that it does not contribute to conflict or human rights abuses) and is therefore eligible to feed into certified supply chains. It may form part of broader formalization processes but does not comprise the full range of ASM governance and regulatory reforms.

The International Tin Supply Chain Initiative

One of the principal initiatives in DRC – initiated and led by industry - and now the region is the international Tin Supply Chain Initiative (iTSCi), which was launched in 2010 by the International Tin Research Institute. It was initially piloted in DRC and Rwanda and later expanded throughout the Great Lakes region. As it evolved, the iTSCi could be seen as taking forward the implementation of the OECD Due Diligence Guidance through a series of traceability and risk-management mechanisms across 3T supply chains. A central element was government-led mine site validation, through which mine sites assessed as free from armed group interference could be approved for participation in certified supply chains. These approved sites were then subject to regular audits and verification intended to ensure they continued to meet the validation criteria. The system also incorporated the tagging and bagging of mineral consignments, chain-of-custody documentation, incident reporting, and risk-identification and mitigation procedures to track minerals from validated mine sites through the supply chain.[53]

The Regional Certification Mechanism

Given the cross-border nature of mineral supply chains, traceability and due diligence schemes also depend on a degree of alignment in regulatory standards and enforcement across neighbouring countries; differences in tax and regulatory regimes would otherwise create price differentials that incentivize smuggling.[54] At roughly the same time as the iTSCI initiative was being rolled out, Member States of the International Conference on the Great Lakes Region (ICGLR) developed a complementary Regional Certification Mechanism (RCM) for designated minerals, principally the 3Ts and gold (see box C for further background). The RCM does not create a new set of due diligence standards, but establishes a regional framework with shared standards on mine site validation, chain-of-custody controls and export certification. It is intended to align with Organisation for Economic Co-operation and Development (OECD) due diligence expectations and operate alongside traceability programmes such as the iTSCi.[55]

In practice, RCM mine site status is determined through inspection and validation processes carried out under national and regional procedures, while chain-of-custody functions – including tagging and bagging, traceability data and incident reporting – are often supported through interoperable industry systems such as the iTSCi in 3T supply chains.[56] One of the key tools within the RCM was the introduction of a traffic light system to signal whether a mine site had been inspected and verified, confirming that it "does not directly or indirectly provide support to non-State armed groups and/or public or private security forces engaged in illegal activity and/or serious human rights abuses".[57] Initially, these included the classic traffic light colours of Green (Validated), Yellow (Provisionally Validated) and Red (Not Validated). In 2019, a fourth, Blue status, was introduced to indicate that a mine site had not yet been inspected, or not re-inspected in the required timeframe, and for a temporary (three-year) period, minerals from this mine could continue to be certified before the mine was downgraded to red status. The impetus for the addition was to address the slow pace and limited number of inspections. In the first eight years of the RCM, just 600 mine sites (from a total exceeding 1,500 sites) were inspected in the DRC.[58] In addition to this traceability and certification system, the RCM is connected to broader regional commitments to harmonize policies, and encourage tracking and transparency (see the six tools of the RINR in Box C).[59]

Box C: The ICGLR and RINR

The ICGLR is an intergovernmental framework of 12 Member States that emerged in the 1990s as a mechanism for encouraging regional cooperation on peace, stability and development in the Great Lakes region.[60] It was further institutionalized as the key regional cooperation framework for taking forward the 2006 Pact on Security, Stability and Development in the Great Lakes Region, a broader set of commitments on security, stability and development cooperation that included a "Protocol against the illegal exploitation of natural resources."

In 2010, ICGLR Member States further committed themselves to harmonizing and coordinating their policies with a view to addressing illegal natural resources exploitation and trade, creating the Regional Initiative against the Illegal Exploitation of Natural Resources (RINR). This comprised six core tools, including those that overlap or reinforce some of the development approaches discussed in this section: the RCM, Harmonization of National Legislations, a Regional Database on Mineral Flows, Formalization of Artisanal Mining Sector, the Extractive Industries Transparency Initiative, and a Whistleblowing Mechanism.[61] The regional transparency, information-sharing and whistle-blowing tools were designed to complement the certification process by helping identify discrepancies, investigate suspected smuggling or fraud, and strengthen confidence in the integrity of the regional system.[62]

Formalization and Mine Site Governance Initiatives

Much of the mining sector in eastern DRC operates through informal or weakly regulated ASM sites, with minerals then primarily exported through informal or illicit channels. The informal nature of the sector makes it difficult to validate mine sites, establish reliable chain-of-custody systems, and provide assurance that minerals exported through formal supply chains are conflict-free. In response, over the last decade and more, donor-supported interventions across eastern DRC and the wider Great Lakes region have sought to formalize the mining sector by legally registering artisanal mining sites and cooperatives, strengthening mining sector oversight and licensing systems, and providing technical training and institutional support for mining authorities and ASM actors.[63] Some programmes also supported the establishment of ZEAs, designated areas intended to provide a legal framework for artisanal mining activities and improve State supervision over ASM production.[64] Prominent examples included the World Bank's PROMINES project, which focused heavily on mining governance and institutional reform, as well as responsible sourcing initiatives such as United States Agency for International Development's (USAID) Responsible Minerals Trade programme and IMPACT's Just Gold project.[65] Some of these programmes also engaged with or were supported and facilitated by UN entities, for example, with members of the UN CT (such as International Organization for Migration, IOM) co-funding and supporting some PROMINES initiatives, and MONUSCO resources facilitating or coordinating with some mine site governance initiatives.

Formalization initiatives have often incorporated additional components designed to respond to broader governance challenges and grievances experienced by mining communities. Miners and traders often face predation, arbitrary taxation, corruption and abuse, not only from armed groups but also from State officials, security forces, and other local authorities. Efforts to improve accountability and transparency, and create other dispute-resolution, governance and grievance mechanisms at mine sites, such as local dialogue platforms, monitoring committees, hotlines that enable citizens or miners to report in incidents, and other community dialogue mechanisms can help build trust in formalization initiatives and address some of the governance grievances that otherwise push miners and traders toward informal channels.[66] For example, ZEAs that offered basic services, dispute resolution and accountable cooperative structures helped stabilize operations, improve confidence in formal trading arrangements, and reduce some of the governance grievances that often pushed miners toward informal channels.[67] Mine site governance initiatives and linked development programming have also frequently sought to address issues experienced by particular groups, for example, improving conditions that are particularly likely to deter or disadvantage women miners or other small-scale miners. This includes through ancillary livelihood support, establishing safe-work protocols, and gender inclusion measures in cooperative governance programmes.[68]

Box D: Community Livelihoods

Many of these responsible sourcing initiatives are happening alongside broader economic development and livelihood initiatives, which can play an important role in addressing the underlying drivers of the illicit minerals trade, as well as in some cases, armed group recruitment. These efforts have included means of channelling revenues back into mining areas; efforts at income diversification, women's economic participation or other broader livelihood-focused inputs in these communities; as well as support to cooperatives or local governance structures that could stimulate greater community input and governance of local economic sectors.[69] Livelihood diversification initiatives, for example, like those previously supported through the United Kingdom-funded ÉLAN RDC programme, were not necessarily designed to replace mining outright.[70] Rather, they sought to expand the range of economic options available to mining communities, strengthen household resilience and reduce vulnerability to economic shocks and income fluctuations. Even where households continued to engage in mining, such interventions could lessen dependence on exploitative credit, pre-financing and trading arrangements that reinforce participation in informal mineral economies.

Programmes that combined responsible sourcing and formalization efforts with broader livelihood and development interventions are a step in the right direction, helping address the community-survival needs that contribute to the dominance of illicit channels of production and export. At the same time, nearly all interlocutors stressed the limits of livelihood diversification in a context like DRC. In many conflict-affected areas, artisanal mining remains one of the few accessible and reliable sources of income. As one interlocutor observed, efforts to move populations away from mining have often proven to be "like pushing water upstream".[71] As a result, they have tended to be effective only as long as external support was there.

Effects and Challenges in Responsible Sourcing Initiatives

Some positive learning and practice has emerged from these initiatives. Past initiatives have offered proof of concept that responsible sourcing initiatives can address some of the underlying economic incentives toward illicit exploitation and trade, and armed group capture by encouraging legal exports and greater civilian oversight authority.[72] For example, in secure and logistically-supported contexts – including large-scale operations such as Alphamine and Kibali – traceability and monitoring systems have helped facilitate legal exports, regulatory oversight and investment.[73] Project-level initiatives like the USAID-supported Zahabu Safi project have demonstrated that public-private due diligence and traceability mechanisms can support formal export pathways for gold.[74] While the linkage with armed group predation and exploitation has proven harder to break, in eastern DRC, some validated 3T mine sites saw reduced direct interference by the FARDC and armed groups.[75]

Over time, the availability of validated and traceable export channels may help reduce commercial and reputational risks associated with sourcing from conflict-affected regions, potentially increasing downstream confidence in licit mineral supply chains. Such “de-risking” can make it more likely that refiners, financial institutions and other downstream commercial actors are willing to source from, finance or otherwise engage with the mineral trade coming out of eastern DRC. This can help legal export channels to expand and ultimately become more competitive with smuggling.[76]

Limited Implementation and Operational Constraints

Nonetheless, while many see these initiatives as a step in the right direction toward strengthening responsible mineral supply chains, numerous challenges have emerged in practice. Security and safety concerns remain major factors, with outbreaks of conflict and violence limiting access to many sites, and interrupting regular validation and certification processes. The need to continually relocate staff or identify alternative logistical arrangements increases the overall operational risk, making these initiatives difficult to sustain. These operational issues are compounded by physical access challenges, such as poor roads and the dispersed nature of ASM sites across very large geographic areas (especially for gold). Additionally, mine site certification and validation processes depend on governmental institutions capable of conducting monitoring, audits and enforcement. In eastern DRC, the continuing insecurity, limited presence and capacity of governmental authorities, and regular reports of collusion of some government and security actors in illegal natural resources exploitation, have meant that those government regulatory conditions are in scarce supply.

As a result of all of these factors, across eastern DRC mine site validation has proceeded slowly, incomplete certification processes were common, there was limited accessibility to operational artisanal mining zones, and repeated delays in implementing independent audit and oversight mechanisms.[77] These challenges were particularly pronounced for gold, where the dispersed nature of artisanal extraction, the high value-to-weight ratio of gold (see Box A above), and its embeddedness in informal smuggling networks made traceability mechanisms substantially more difficult to implement. In order to address the slow pace of mine site validation, the RCM introduced a “Blue status” as an interim validated designation. Yet very few sites achieved even Blue status, in part because the status itself offered only a partial incentive, which was insufficient to generate the level of public and private capacity to expand the number and speed of assessments.[78] This weak implementation record, together with infrequent third-party audits and a not yet fully functional regional database (the third planned tool within the RINR), undermines the credibility of the RCM.[79]

Due to these implementation challenges, only a very small volume of certified goods have reached supply chains so far. This creates an additional market-based challenge to these responsible sourcing initiatives’ success: lack of commercial viability. One USAID study of ASM interventions highlighted that due to the range of challenges in certification and traceability, as well as to transport costs and other financial barriers in an area like eastern DRC (where many mine sites are remote and not well connected), what is ultimately available downstream in commercial markets is an extremely limited quantity of certified ASM gold. “Refiners need a commercially viable supply of gold for their investment to make financial sense. This means that they need scalable and reliable supply,” the report concluded.[80] Without sufficient volumes, efforts to create formal and certified supply chains will not be able to out-compete informal supply chains.

Aligning Responsible Sourcing with Local Incentives

Although responsible sourcing pathways stand to benefit miners and small traders, thus far responsible sourcing initiatives have struggled to gain traction with these communities. Formalization and registration procedures often come with additional fees and technical requirements, which many small-scale miners – many of whom have limited resources, literacy and free time – struggle to meet.[81] Heavy documentation and reporting requirements are particularly likely to disadvantage smaller community-based cooperatives and women-led groups.[82] Meanwhile, formalized or certified supply chains may offer fewer advantages compared to illicit channels in terms of addressing miners or traders' liquidity needs. One interlocutor noted that informal mineral trading networks, including some linked to armed actors, often provide systems of credit and pre-financing that are largely unavailable through formal channels and banking systems.[83] Lack of advance or guaranteed payment remains a major reason why efforts to formalize mining sectors and create licit pathways of export remain limited, particularly when it comes to gold.[84] Efforts to address miners' sources of liquidity, enable market access, and other fair weighing and transparency initiatives can help remove some of the barriers to participation in formalization and certification initiatives, yet these measures have so far not been prominent in most responsible sourcing initiatives.[85]

> ## Key finding
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> Mineral extraction is not solely a financing mechanism for armed actors; it is also a core livelihood strategy for communities operating in conditions of fragility.
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> Unless responsible sourcing and formalization initiatives are able to address these underlying livelihood dilemmas, the incentives pushing miners and communities toward unregulated mining and illicit export will remain.

Formalization and responsible sourcing initiatives have also struggled because they have largely been unable to address – and in some cases may inadvertently exacerbate – the extractive taxation systems and checkpoint economies that shape mineral production and trade in eastern DRC. Predation, extortion and illegal taxation is a feature of life in eastern DRC, whether at government collection points or informal checkpoints manned by armed groups. One interlocutor gave the example of a prominent supply line in South Kivu that was subject to 50 different types or points of taxation, only 16 of which were legal.[86] While threats and security issues posed by criminal and non-State armed groups often garner the most attention, interlocutors pointed to rent-seeking opportunities and exploitation of mining zones by government officials or government-linked actors in eastern DRC as being an equal or greater issue for miners and communities. Certification and formalization initiatives could make some of these patterns of predation and extortion worse by making sites more visible without making them safer. As one study summarized, artisanal miners are "now preyed upon by a host of state bureaucrats, officials and security officers rather than warlords and militias".[87] While some initiatives have given attention to safety at mine sites and along transport corridors, addressing the larger challenges of insecurity and predation has largely been viewed as something beyond the scope of most development and private sector actors.

More fundamentally, interlocutors repeatedly stressed that responsible sourcing initiatives have often failed to account for the livelihood and survival needs that underpin participation in ASM. Mineral extraction is not solely a financing mechanism for armed actors; it is also a core livelihood strategy for communities operating in conditions of fragility. For many households across eastern DRC, mining provides one of the few sources of predictable and immediate cash income, helping to finance food purchases, agriculture, small businesses, school fees and other household needs.[88] Unless responsible sourcing and formalization initiatives are able to address these underlying livelihood dilemmas, the incentives pushing miners and communities toward unregulated mining and illicit export will remain (see also box D on Community livelihoods).

Taken together, these critiques point to a broader blind spot within responsible sourcing and ASM formalization initiatives. Many have been structured around downstream compliance requirements. As such, they are often not designed with a view to addressing the tension that inevitably surfaces at the mine site or trading site level between regulatory compliance and those seeking to address immediate and core livelihood needs.

Critiques of iTSCi and the Regional Certification Mechanism

Beyond these implementation and design challenges, the iTSCi itself has come under fierce criticism and investigation. Critics argue not only that the initiative has enabled substantial "laundering" of conflict minerals from eastern DRC into ostensibly validated supply chains, but also that its governance, transparency and commercial relationships have created potential conflicts of interest that undermine confidence in its monitoring and due diligence functions.[89] Minerals originating from unvalidated mine sites – including sites where there has been clear militia capture or child labour – frequently enter certified supply chains and are exported through channels presented as compliant with traceability requirements.[90]

The RCM, and the linked domestic oversight and regulatory efforts, have also faced substantial critiques. Lack of implementation of validation and certification processes, as well as limited reporting and transparency over mineral certification and exports, have been attributed to insufficient capacity, trained staff, State presence and regulatory mechanisms, as well as inconsistent political will to fully enforce validation, reporting and export-verification requirements. Congolese authorities have themselves acknowledged that there have been instances of State complicity in smuggling, particularly of gold into Uganda and Rwanda, further eroding the credibility and effectiveness of traceability and audit mechanisms.[91]

Beyond these domestic implementation challenges, independent reporting has documented limited enforcement and transparency on the part of neighbouring States. Global Witness has documented a regular pattern of minerals trafficked out of eastern DRC into neighbouring countries (especially Rwanda), where they are certified as domestic volumes.[92] As one expert observed, "From a national point of view, it is within the DRC's interest to have these tools, but not in the economic interest of any of the neighbouring countries."[93] Illicit trade thrives in eastern DRC and the surrounding region because it aligns not just with the interests of traders, miners or armed groups involved, but also with State interests in the region.

Structural Challenges Related to the Regional and Cross-Border Nature of the Conflict Minerals Issue

A final issue is that the regional and cross-border nature of mineral supply chains creates structural challenges for responsible sourcing, certification and due-diligence mechanisms that extend beyond the challenges of regional regulation to more fundamental issues of how to organize cross-border interventions.

A first challenge is a regulatory one: taking these initiatives forward requires integrating and implementing them through what are largely national regulatory and governance mechanisms. Yet the conflict economies they seek to influence are distinctly transnational in nature, and are shaped by regional patterns of trade, taxation, enforcement and political interests. While regional certification initiatives such as the RCM can improve reporting and coordination, they have so far not been able to harmonize standards sufficiently to close the cross-border arbitrage opportunities that make smuggling attractive. Still large differences in enforcement, taxation and certification requirements across the region means that when controls are strengthened in one location or jurisdiction, traders and intermediaries can simply shift routes, markets or export channels. To close these gaps and reduce incentives toward smuggling would require a much greater willingness on the part of Governments in the region to change their policies in alignment with regional neighbours, and then to fully enforce them. The willingness to do so has so far not been there in the Great Lakes region. The further escalation of regional tensions since 2025, in particular between the DRC and Rwanda, has made the idea of greater regional integration and harmonization even less likely in the near term, notwithstanding the commitments contained in the REIF.

This dynamic highlights a central limitation of current institutional or regulatory approaches: meaningful reductions in illicit regional trade would require a genuinely transnational approach to regulation and enforcement, rather than piecemeal national efforts. Doing so in a

> **Key finding**
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Responsible sourcing initiatives have also struggled to think transnationally in terms of addressing the transnational incentive structures that shape upstream actors' behaviour (from liquidity constraints to aligning taxation systems and rules across multiple jurisdictions). Part of the challenge is that doing so would require harmonizing the work and approaches of very diverse commercial and development actors – ranging from private banks to International Financial Institutions, development-focused non-governmental organizations (NGOs) and public-private sector initiatives. For example, addressing miners' and traders' liquidity constraints might require the engagement of regional financial institutions and other private sector actors capable of providing credit or payment mechanisms. Yet for these to reach miners and traders at sufficient scale, they would likely also depend on international or local development organizations and NGOs with local implementation capacity, alongside larger government- or IFI-supported initiatives capable of improving infrastructure, market access and regulatory conditions across the broader cross-border economy. Unless these different actors and tools work in alignment with each other, it will not be possible to reshape the incentives that continue to sustain illicit trade.

In addition, while the many development actors whose work would enable combined responsible sourcing and livelihood initiatives to take hold can in theory operate across national boundaries, many remain tied to nationally organized funding streams, programmes and institutional structures. Even where the same organization operates in neighbouring countries, these programmes are often planned, financed and implemented independently rather than as part of a joint cross-border strategy.

Key Take-Aways on Development Responses to Conflict Minerals

- **When designed well, responsible sourcing initiatives can help to close the opportunities for armed groups to benefit from the mineral trade.** They do so by creating market incentives for responsibly sourced goods downstream, while simultaneously creating enforcement mechanisms that can constrain opportunities for armed group interference at mine sites and along trade routes.
- **However, while responsible sourcing initiatives show promise, the impact of these various traceability, certification, formalization and due diligence schemes is constrained by operational, implementation and market challenges**. Limited implementation and weak assurance systems – limited audits, incomplete databases and irregular validation cycles – undermine the credibility of these systems and continue to enable cross-border laundering. In addition, insufficient attention to miners', traders' and communities' economic survival needs has limited participation in these initiatives and reduced their ability to shift the incentives that reinforce illicit exploitation and trade.
- **Insecurity, governance gaps and a lack of political will and cooperation by government actors in validation, export verification and reporting processes remain the most significant obstacles to implementing these initiatives, and to seeing their effects at scale.** Even where responsible sourcing and due diligence frameworks have been established, their effectiveness depends on a minimum level of security, enforcement and political commitment, including sustained cooperation by neighbouring States whose actions shape the wider regional trading environment.
- **While the ICGLR's RCM provides a structured regional framework for certification and policy harmonization, its effectiveness hinges on a set of enabling conditions that are not present in much of eastern DRC and its neighbouring States.** Implementing the RCM, other certification schemes and formalization initiatives depends on aligning security, administrative capacity, fiscal incentives and cross-border governance, in ways that are unrealistic in the current political and administrative environment.
- **This scattered record of certification and overall low levels of formalization makes it easy for armed groups to exploit weaknesses in the system.** While some validated 3T mine sites within eastern DRC saw

reduced direct interference by both FARDC and armed groups, this is in part because these actors simply shifted to sites and supply chains that remained outside the reach of certification, regulatory and monitoring efforts.[94]

- **As a result, responsible sourcing can yield development gains without automatically delivering conflict prevention gains.** Even where initiatives reduce interference at specific mine sites, armed groups and networks can adapt by shifting toward uncertified sites, transport routes, trading networks or other points in the supply chain, as well as through exploiting cross-border arbitrage opportunities. Armed actors may therefore continue to profit from the mineral trade even where formal compliance improves at particular sites. Development-oriented progress is necessary but insufficient for conflict prevention if the cross-border governance and regulatory structure gaps remain.
- **Focusing narrowly on eliminating illicit flows and illicit exploitation of minerals, without recognizing the livelihood dependence on these practices, is more likely to just push or displace these activities to more remote or riskier sites, rather than eliminating them.** Traceability, certification and validation mechanisms create fees and other transaction costs that make it more costly to trade via licit channels compared to illicit ones in the short term. As a result, where greater regulatory oversight was introduced through traceability and formalization initiatives, some miners and traders shifted to less regulated mine sites, supply chains or cross-border trading routes.
- **The net effect of all these factors is that long-term development and economic incentives do not outweigh the immediate and more certain short-term benefits of continuing to mine and export via informal or illegal networks.** This will continue to be the case unless fiscal and enforcement measures close the financial payoff gap between licit and illicit trade. While development and market-based tools can reshape segments of the supply chain, they struggle to alter the broader cross-border political economy in which conflict mineral economies are embedded.

Taken together, these findings highlight structural constraints – particularly insecurity, cross-border arbitrage and governance gaps – that have made it difficult for development initiatives surrounding conflict minerals to gain traction. These findings also underscore the potential role of peacekeeping and other political and security actors in complementing development approaches by addressing some of the governance, security and cross-border dynamics that development interventions alone cannot readily resolve. The subsequent section will explore this potential complementary role by discussing how MONUSCO, the Special Envoy's office and other UN actors have (or indeed have not) stepped in to address some of these gaps.

III. Peace and Security Responses to the Armed Group-Illicit Natural Resources Nexus: Peace Operations, Sanctions and Regional Engagement

At least since 2008, responses to the link between illicit natural resource exploitation and armed groups have progressively been incorporated into the mandates of a number of Security Council-authorized actors and mechanisms. These include two successive UN peacekeeping operations mandated in the DRC, MONUC (1999-2010) and MONUSCO (2010-present), as well as the Special Envoy for the Great Lakes Region, appointed in 2013. This section will lay out how these peace and security actors sought to address these issues in practice, including through monitoring and reporting, good offices, regional coordination and facilitation, and other stabilization activities. The conclusion of this section will then identify some key take-aways, including the overall effects of some of these measures vis-à-vis armed group capture and exploitation of natural resources, how well these efforts complemented other development efforts, and some of the challenges and limitations that these peace and security actors faced, many of them common to those identified in the previous section on development approaches. The Annex to this report includes a chart highlighting trends in MONUSCO tasking related to natural resources, as well as other related recommendations in Security Council resolutions for the DRC.

Sanctions Mechanisms and Associated Monitoring and Reporting

The first peace and security mechanism with a dedicated focus on illicit natural resources revenues as a conflict driver was the DRC sanctions regime and associated monitoring mechanisms. The predecessor monitoring body to the current Group of Experts, the UN Panel of Experts on the Illegal Exploitation of Natural Resources, was (as its title suggests) established by the Security Council in 2000 explicitly to explore how illegal exploitation was undermining the peace process and contributing to conflict drivers in eastern DRC. As noted above, the reporting of the UN Panel of Experts, and subsequently the Group of Experts, which was created to support the Sanctions Committee in resolution 1533,[95] directly contributed to the establishment of due diligence standards, the basis for many of the responsible sourcing initiatives discussed.

The link between illicit exploitation and export of natural resources and armed groups has also been recognized in the UN sanctions regime for the DRC. The 2004 resolution establishing a sanctions regime for the DRC established an arms embargo and explicitly recognized a link between the "illegal exploitation of natural resources and trafficking in raw materials and arms".[96] In 2008, the UN sanctions regime for the DRC was updated to include specific designation criteria, including "individuals or entities supporting … armed groups … through illicit trade of natural resources, including gold".[97] Subsequent resolutions expanded these criteria to encompass a broader range of actors, activities and commodities that included "criminal networks, involved in destabilizing activities in the DRC through the illicit exploitation or trade of natural resources, including gold or wildlife as well as wildlife products".[98]

While these sanctions authorities have been used sparingly (see Box E), the recognition of illicit natural resources trade as a key driver of conflict in the sanctions regime has enabled broader monitoring and reporting on these issues by the Group of Experts, as well as by MONUC and then MONUSCO.[99] This monitoring and reporting, particularly by the Group of Experts, has been among the most prominent sources of information on the linkage between armed groups and illicit exploitation and export of natural resources, informing not only Security Council measures and other diplomatic engagement but also spurring some of the responsible sourcing measures identified in the previous section. The regular monitoring and reporting by the Group of Experts has also been among the most detailed in following the implementation and effects of mine verification and traceability initiatives, including those linked to regional frameworks and those undertaken through private sector initiatives.[100]

Box E: Sanctions in Relation to Illicit Use and Trafficking of Natural Resources

The UN sanctions regime has acknowledged the issue of illicit natural resources trafficking and exploitation since 2004, initially linked to the arms embargo, and from 2008 as a stand-alone listing criteria. However, in the past two decades this basis has rarely been used. In 2007, several entities were listed for violating the UN arms embargo because their gold mining and/or export businesses had contributed revenue to armed groups, enabling them to purchase arms.[101] In 2018, an armed group leader in the DRC was listed in part because the group imposed illegal taxes in gold mining areas “and used the proceeds to purchase weapons”.[102] In February 2024, the founder and leader of the Mai-Mai Yakutumba militia was listed under the UN sanctions regime for DRC, both for his role in directing the activities of the militia and for the militia’s involvement in the illicit exploitation of natural resources (specifically gold mining).[103] Prior to the 2025 M23 crisis, the European Union and the United Kingdom (UK) had also applied sanctions, albeit sparingly, to armed group leaders in the DRC and prominent gold traders and companies (for example, a Belgian gold trader who came under both European Union and UK sanctions in 2022 and 2024, respectively).[104]

The M23 crisis renewed attention to sanctions related to the role of illicit natural resources exploitation in fueling conflict. At the height of diplomatic tensions between the DRC and Rwanda following M23’s advances in 2025, the Government of the DRC publicly called for sanctions on Rwanda in relation to the illegal exploitation and export of natural resources.[105] Although considered, the Council did not ultimately impose additional sanctions on Rwanda or linked groups (although it did call on the Rwanda Defence Force to cease support).[106]

Nonetheless, the renewed attention to sanctions in this context did appear to lead to additional natural resources-related designations within UN and unilateral sanctions regimes. In March 2025, the European Union designated nine individuals and one entity, including a regional gold refinery and a senior Rwandan mining official, for exploiting the conflict, including through illicit trade in minerals.[107] In August 2025, the United States imposed sanctions on four entities – an eastern Congolese armed group, a Congolese mining cooperative and two foreign intermediary firms – for trafficking critical minerals from Rubaya and other conflict-affected mining zones, citing their role in financing violence and enabling armed group expansion.[108] More recently, in July 2026, the Security Council’s DRC Sanctions Committee added six individuals and two entities to the UN sanctions list. Among them was the Alliance Fleuve Congo (AFC), an M23-allied politico-military movement, which was listed in part for supporting armed groups involved in illicit natural resource exploitation or trade.[109] M23 intelligence chief John Imani Nzenze was also listed, with the Committee specifically citing his involvement in the illicit exploitation of mining sites in Rubaya.[110]

Security Operations, Stabilization and Armed Group Disruption

The principal entry point through which MONUC and later MONUSCO engaged with conflict mineral issues has been in addressing their role in financing armed groups in eastern DRC. As early as 2004, there was a basis for MONUC to take part in some monitoring and interdiction activities through its role in supporting the sanctions regime. The sanctions regime, established in 2003 and further operationalized in 2004, drew a link between arms trafficking and proliferation and the “illegal exploitation of natural resources and trafficking in raw materials and arms” and requested MONUC to monitor border crossings, inspect suspicious vehicles or aircraft and seize prohibited items and related materials.[111] However, the earliest direct tasking for peacekeeping missions in the DRC related to “natural resources” came in 2008 and 2009, when the Security Council mandated MONUC to use its resources to prevent armed groups from benefiting from “illicit trade in natural resources”, initially through monitoring and inspection and then through joint operations with the FARDC.[112] With MONUSCO’s inaugural mandate in 2010, the mission was mandated to support the DRC Government and regional countries’ efforts to prevent “illicit economic activities and illicit trade in natural resources” from lending support to armed groups.[113] This was framed as part of the mission's stabilization mandate (see the Annex for further trends in MONUSCO's tasks).

Subsequent mandates followed suit, linking MONUSCO support or activities related to illicit natural resources to the mission's disarmament, demobilization, reintegration, repatriation and resettlement (DDRRR[114]) or stabilization mandates.[115] For example, the 2023 mandate explicitly positioned MONUSCO support on mining activities and structures under its disarmament and stabilization tasks, continuing prior mandated language (since 2014) that MONUSCO should provide technical support to the Government for effective and equitable civilian management of mining structures, and noting mining sites could be "entry-points for conflict transformation", providing "viable, safe, dignified livelihood options for ex-combatants".[116] The latter illustrates the dual link between mining activities and DDRRR, with proceeds from natural resources functioning as a potential source of conflict financing and also a source of alternative livelihoods that could ease the transition of former combatants.[117]

MONUSCO's stabilization coordinating role has also indirectly created a level of engagement with development responses to conflict minerals. Addressing economic drivers of conflict has been embedded in the multilateral stabilization strategy for the DRC, known as the International Security and Stabilisation Support Strategy (ISSSS), almost since its inception.[118] MONUSCO has a central coordinating role for the ISSSS, and ISSSS-linked projects have included mining-related activities, creating opportunities for cooperation between the mission and external development actors working on such issues.[119]

Some of MONUSCO's operationalization of these mandates has involved proactive efforts to disrupt armed group control of mine sites or supply routes. One of the clearest examples came after the Security Council's 2016 authorization for MONUSCO to develop "tailored responses" to the perceived crime-conflict nexus in eastern DRC and the linkage between illegal or criminal activities and armed group support.[120] In taking forward this mandate, MONUSCO established a Criminal Network Task Force in the DRC. Among other initiatives, the Task Force undertook efforts to map and develop a strategy for addressing armed group involvement in illegal exploitation of natural resources. This included the development of an innovative pilot initiative that sought to disrupt armed group capture of illicit charcoal supply chains and channel charcoal revenues toward the community. This initiative included coordinated efforts by multiple parts of the mission including:

- MONUSCO force contingents (supported by analytical components) conducted targeted military operations to disrupt the FDLR's involvement in illicit charcoal supply chains.
- MONUSCO civilian staff supported DRC officials in prosecuting economic and environmental-related crimes.
- MONUSCO supported quick impact projects in North Kivu that would facilitate community engagement in the charcoal trade and other alternative livelihood sources.[121]

MONUSCO's security operations have also sometimes indirectly contributed to breaking the link between armed groups and illicit natural resources trade. Leading up to the 2012 crisis when M23 took over significant territory in eastern DRC (including both mineral-rich sites and the main city of Goma), M23 gained strength by controlling and taxing supply routes and border crossings.[122] Meanwhile, other groups – local Mai-Mai groups, the Nduma défense du Congo-Rénové (NDC-R) and affiliated groups, and the FDLR – were in direct control of several mine sites (some operating in collusion with the FARDC).[123] With the establishment of the Force Intervention Brigade (FIB) in 2013, MONUSCO was empowered to undertake offensive operations against armed groups threatening civilians, specifically the M23.[124] While these operations were aimed at protecting civilians and restoring State authority, they also disrupted M23's ability to control key trade corridors, border crossings and taxation points that generated revenue.

Key finding

MONUSCO security operations have directly or indirectly contributed to disrupting armed group control of illicit natural resources financing chains, including through FIB operations and a 2016 multi-sector pilot initiative to disrupt armed group capture of illicit charcoal revenues.

After the defeat of the M23 in late 2013, the FIB increasingly focused on other Congolese and foreign armed groups active in eastern DRC, in some cases disrupting armed group control of mining areas and illicit trade routes (albeit often only temporarily). One expert gave the example of operations around Kashugo in 2017 that disrupted control by the armed group Nduma défense du Congo-Rénové (NDC-R) over mine sites and natural resource supply routes in the Kashugo area.[125] This resulted in an economic boon to local residents, he noted, as prices increased and armed group capture of revenues was disrupted.[126]

MONUSCO Support to Mine Site Governance, Traceability and Other Efforts to Counter Illicit Natural Resource Trade and Exploitation

While since 2015, MONUSCO has more often played an indirect role in some of the responsible sourcing initiatives discussed in the previous chapter, in its first few years, MONUSCO was mandated to directly engage with and facilitate mine site validation, certification and other governance and development responses to conflict minerals (see the Annex for a chart providing an overview of trends related to MONUSCO's mandated tasks). With MONUSCO's very first mandate, in 2010, the mission was given a role in supporting a pilot traceability initiative in the Kivus, which had begun during the MONUC period.[127] The essence of this pilot initiative was to create five designated "trading counters" (centres de négoce) that would act as a "one-stop shop" where DRC officials could track production and collect taxes, while miners and traders could benefit by trading minerals at sites free from armed group interference.[128] This connects to mine site validation, traceability and due diligence systems, by creating a monitored, armed group-free link in the mineral supply chain.

Although mandated to be in a supporting role, MONUSCO engagement was so prominent that some studies refer to it as a joint MONUSCO and Congolese Government initiative.[129] Through its analysis and monitoring of illicit trading patterns and armed group linkages, MONUSCO contributed to the identification and establishment of the sites. It also provided overall coordination and security, and trained Congolese police at the trading centres.[130] Throughout this period, MONUSCO assisted the Ministry of Mines "in validating certain sites as free of armed groups or security forces" by carrying out spot checks of mine sites, trading routes and markets near these trading centres (as authorised explicitly in Security Council mandates from 2010 to 2012).[131] Other members of the UN CT – notably IOM – were also involved in implementation of the pilot trading centres.

The pilot trading initiative went defunct and was suspended in late 2013, after only two of the five trading centres had been established. MONUSCO responsibilities surrounding these sites was transferred to IOM in July 2014.[132] While there were many challenges facing these pilots, the principal obstacles were the same as those that beleaguered many of the responsible sourcing initiatives discussed in the prior chapter – persistent insecurity and weak governance and regulatory frameworks. UN reporting suggested that the pilot had run aground because of insecurity and fighting surrounding the Walikale mining sites, as well as due to recurrent disputes between land title holders and artisanal miners and the absence of an official artisanal exploitation zone.[133] The same Secretary-General report concluded that broader legal and economic reforms, including revisions to the Mining Code, would be required to address these challenges.[134] Another independent study reinforced these observations with regard to the titling disputes, and added that a broader challenge with formalization and traceability initiatives was that local State agents "do not have the means to put formalisation provisions in place" due to broader land tenure, and legal and governance constraints.[135]

The pilot not only struggled to shift these larger legal framework and governance issues, but also faced the challenge of a lack of demand, and even outright resistance, by the communities involved. One UN staff member recollected that the idea of a clean, transparent place to trade goods "looks nice, but was not easily implemented". [136] Miners and traders who were used to a predominantly informal system of operating did not necessarily want a formal State-controlled place "where they would have to pay taxes and register" particularly given that the sites were not all that "clean or verified in the first place". [137] In essence, the initiative depended not only on legal reforms and stronger government oversight, but also on changing long-established State-society understandings of issues like taxation, governance and the remit of the State.

In addition to engagement with the trading centres, throughout 2013 and 2014 MONUSCO supported bagging-and-tagging systems, mine site validation exercises and traceability initiatives. [138] This included both logistical and security support to validation teams, as well as to government officials. [139] Much of this work was linked to ICGLR certification initiatives or to mine site validation covered by the iTSCi programme. [140] MONUSCO also tried to establish joint MONUSCO-government teams for monitoring illegal trafficking in minerals, but lack of resources and government capacity meant that these never came to pass. [141]

Key finding

Even where MONUSCO was mandated to directly support responsible sourcing initiatives – as with its support to a 2010 to 2012 pilot trading centre initiative – its efforts were stymied by some of the same challenges as beleaguered development initiatives: persistent insecurity and weak governance and regulatory frameworks.

Lack of demand, and outright resistance, by communities to a formal State-controlled place "where they would have to pay taxes and register" was also an issue.

Beginning in 2015, and then even more clearly from 2021 onward, the strength of MONUSCO's mandate with regard to illicit exploitation and export of natural resources and the degree of active engagement on mine site validation or traceability initiatives declined. [142] This is despite the fact that since 2013, MONUSCO's mandates have invariably included language about the mission supporting or providing "technical assistance" on "civilian governance" in the mining sector in support of the "equitable" management of natural resources. Although repeatedly reaffirmed in the mandate, interviewees generally viewed this aspect of the mandate as residual or dormant in recent years, disconnected from the mission's key tasks and priorities. [143]

The mission continues to enjoy a mandate to support other efforts to counter the armed group and natural resources link through information-sharing and cooperation. Since 2019, Security Council mandates have frequently included language about MONUSCO helping to stop cross-border flows of arms, combatants and natural resources through information-sharing and coordination. [144] The latest mandate renewal, for example, called on the "Special Envoy for the Great Lakes, MONUSCO, UNOCA [United Nations Regional Office for Central Africa] and other UN entities … to seek political solutions to stop illicit cross-border flows of armed combatants, arms and natural resources that threaten peace and stability in the DRC, by aligning strategies and conducting information-sharing and coordinating their respective reporting." [145]

Reflecting this shift, most interviewees described the mission's more recent engagement as primarily one of monitoring, assessment and analysis. This capacity was further strengthened for several years through the addition of a dedicated natural resources expert position, supported through extra-budgetary funding (although that post is no longer filled). [146] Such monitoring and analysis could potentially inform proactive efforts to address illicit supply chains and armed group capture, or to support wider responsible sourcing initiatives, and has done so in the past. For example, MONUSCO's monitoring and analytical capacity played a critical role in supporting the Government's roll-out of the trading centres and formalization initiatives from 2010 to 2013, and also in developing a 2016 strategy on disrupting armed group capture of illicit charcoal streams (discussed in the next section). However, in more recent years, MONUSCO staff said that the monitoring and analysis was used to primarily inform the mission's Protection of Civilians (PoC) activities and other core tasks, for example, by analysing conflict dynamics in mining areas and identifying ways they might impact mission movements and activities. Perhaps because these monitoring functions were used to inform other mission priorities, there was very little awareness among most development actors about MONUSCO's monitoring activities with regard to natural resources issues, nor a perception that it was contributing to wider efforts on conflict minerals.[147]

MONUSCO's monitoring and analysis of trends in armed group support and illicit trade in natural resources has also informed political engagement at the national and regional levels – for example providing concrete evidence that other Member States can use to advance international and national action to address armed group interventions at key sites, or to encourage greater efforts to take forward regional commitments on direct or indirect support to armed groups.[148]

UN Country Team and MONUSCO Efforts on Illicit Natural Resources

For as long as these issues have been embedded in peacekeeping mandates, the need to consider and address natural resources has equally been present in UN CT frameworks in the DRC. There are no specific Security Council mandates that apply across the UN CT as a whole (although some mandates single out particular agencies or entities for cooperation on specific tasks). But there have been a series of strategic framework documents that are intended to guide the UN CT's development priorities, in furtherance of the host country's development objectives, and as a way to enhance cooperation and alignment with other donor efforts and with the priorities of the peacekeeping mission. In the DRC, these have included the Country Assistance Framework and more recently the UN Sustainable Development Cooperation Framework (UNSDCF), which sets out the UN CT's development priorities and is intended to align with the Integrated Strategic Framework, the mission's overarching coordination framework.[149] Each of these for the DRC has since 2007 incorporated priorities and strategic coordination goals that touch on some of the natural resource and conflict minerals issues.[150] For example, the current UNSDCF includes commitments related to transparent and effective management of natural resources; strengthening land tenure systems; improving governance in the mining sector and supporting its compliance with social and environmental obligations.[151]

In support of these framework priorities (as well as their own organizational mandates and priorities), UN CT members such as the Food and Agriculture Organization, United Nations Development Programme (UNDP), United Nations Environment Programme, United Nations Human Settlements Programme and United Nations Industrial Development Organization have engaged in a range of programming and initiatives that might be considered responses to these conflict minerals, ranging from joint cooperation on some of the stabilization initiatives (those under the ISSSS) to some of the responsible sourcing and alternative livelihoods initiatives discussed in the previous section. For example, IOM has supported cross-border stabilization efforts by facilitating legal trade and mobility, strengthening economic opportunities in border communities, training border officials, and engaging in mining governance and traceability initiatives in collaboration with Congolese authorities and international partners.[152] Similarly, UNDP has supported small-scale interventions linking demobilization or other DDRRR efforts with local economic activities. In some cases, these initiatives have explored the extent to which artisanal mining could serve as a source of livelihood for demobilized ex-combatants, often through projects implemented with local partners.[153]

The relationship between MONUSCO and these broader CT activities varies. As noted earlier, MONUSCO's role in coordinating stabilization activities can mean that it engages quite closely in supporting development and peacebuilding initiatives that contribute to stabilization in a given area, which could include livelihood or governance initiatives related to mining or natural resources. MONUSCO's security and stabilization activities have often contributed indirectly to broader development and livelihood initiatives connected to conflict minerals. Several development actors interviewed who work on some of these initiatives noted that a minimum level of security – which MONUSCO's presence and deployment strategies have at times provided – has been a prerequisite for progress on their projects. Many humanitarian and development actors also rely on the framework of MONUSCO's presence, or on its logistical support, to access certain areas for development programming, especially in remote borderland areas like the Kivus. Reflecting on MONUSCO's ongoing withdrawal, one development actor expressed concern that "once [the Mission] is rolled up, it's going to be very difficult to programme in the same way".[154]

Beyond security, the mission's broader activities, including road construction and stabilization activities (for example through quick impact projects), and technical and advisory support to the Government on a range of governance issues, were seen as complementary to development actors' efforts to address market access barriers or other governance gaps (even if they were often not designed with that intent). One interlocutor argued that MONUSCO's investments in road infrastructure may have been among its most important contributions to responsible sourcing initiatives, although he noted that greater investment in secondary roads would have been required to truly improve market access.[155] Some NGOs involved in ISSSS projects viewed MONUSCO as a helpful intermediary vis-à-vis the Government on stabilization and related governance work.[156]

Nonetheless, most development actors interviewed who were engaged in initiatives related to responsible sourcing, traceability or connected livelihood initiatives did not see MONUSCO as playing a prominent role, at least not in recent years. Some cited poor information-sharing and coordination. Others suggested that the overall tensions between the Government and MONUSCO, as well as public mistrust of MONUSCO, made it a difficult partner for them to work with.[157]

Good Offices, Political Engagement and Support for Regional Coordination

A key finding from both the development initiatives and MONUSCO stabilization efforts discussed above is that addressing conflict minerals and illicit supply chains ultimately depends on governance reforms and political will, both of which may only shift via the sort of political engagement associated with peace operations' good offices capacities. It is therefore important to consider how MONUSCO and other UN actors used these good offices functions, together with technical assistance and advisory support, to encourage national reforms, strengthen regional cooperation on illicit natural resources trade, and support implementation of regional mineral governance frameworks.

From the earliest period, MONUC and then MONUSCO have enjoyed some scope for good offices and political engagement on natural resources and regional conflict minerals issues.[158] However, the degree of emphasis on the regional nature of MONUSCO's good offices shifted somewhat from 2013. In 2013, the DRC and ten countries of the region signed the Peace, Security and Cooperation (PSC) Framework, committing themselves to a series of national and regional measures intended to address the drivers of conflict in eastern DRC, including support to armed groups, weak regional cooperation and broader cross-border dimensions of insecurity. The Framework has four guarantors: the UN, African Union, ICGLR and the South African Development Community. To fulfill the UN's guarantor role and support implementation of this new regional framework, the OSE-GL was created in March 2013. As a Special Political Mission, it is also considered a peace operation.[159]

The OSE-GL was tasked to "lead, coordinate and assess" the implementation of national and regional commitments of the PSC framework, in coordination with the Special Representative of the Secretary General (SRSG) of MONUSCO.[160] In practice, interviewees described a loose division of labour, with MONUSCO focusing more on the political engagement or good offices as they manifest inside DRC, while OSE-GL assumed greater responsibility for regional diplomacy and cooperation mechanisms.[161] For example, on an issue like DDRRR and regional commitments to cooperate on repatriation of foreign fighters, MONUSCO might focus on engagement with foreign armed groups or relevant stakeholders within DRC, while OSE-GL might take the lead in coordinating with regional stakeholders in the home countries of these armed groups.

In carrying out its mandate, OSE-GL works closely with the other PSC Framework guarantors, including the ICGLR. As noted in chapter 2, the ICGLR already served as the principle regional institution involved in encouraging cooperation and development on the regional natural resources sector, including through specific regulatory mechanisms like the RINR and its certification tools. In practice, the OSE-GL has supported these mechanisms through regional diplomatic engagement, convening State and non-State actors to support implementation of certification and traceability initiatives, and by providing technical assistance and facilitation to ICGLR mechanisms like the RCM.[162] OSE-GL has also engaged regional leaders on implementation of commitments under the ICGLR Protocol on the Illegal Exploitation of Natural Resources (the agreement that formalized the RINR) and helped mobilize donor and UN support for related initiatives. Despite this sustained engagement, deteriorating relations between key ICGLR Member States – particularly Rwanda and the DRC since the resurgence of the M23 crisis – have made it difficult for many of these regional mechanisms to function as intended.[163]

Together, this created a layered good offices architecture, with MONUSCO responsible for political engagement and good offices within the DRC, while OSE-GL assumed greater responsibility for regional diplomacy and cooperation mechanisms, particularly those linked to the PSC Framework and the ICGLR. Interviewees generally described an imperfect, and at times contested, division of labour between the two offices, reflecting overlapping mandates and differing views about their respective roles.

Effects and Challenges of Peace Operations' Efforts to Natural Resources-Conflict Nexus

Taking stock of the ways that MONUC and MONUSCO engaged with conflict minerals issues since 2008 generates an impressive list of tools and capacities that peacekeeping missions can bring to bear on such issues, including: military operations that disrupt armed group control of mine sites, trade routes and taxation networks; support and co-creation of pilot initiatives on mine site validation, traceability and responsible sourcing activities; support to DDRRR, stabilization and alternative livelihood initiatives that provide alternatives to participation in armed groups and illicit mining; technical advice and support to government regulatory and mining-governance reforms; presence and its security and logistical support, which contribute to a broader enabling environment for development and economic activities; and convening, coordination and good offices functions that supported political dialogue, regional cooperation and implementation of governance reforms.

Peacekeeping missions may even bring a unique comparative advantage to such efforts by virtue of their ability to fuse diverse capacities to address multiple aspects of the crime-conflict nexus at once. This was best illustrated by the 2016 pilot initiative that attempted to disrupt armed group capture of the illicit charcoal trade; it was a joint security, law enforcement and market-based response enabled by coordinated efforts between the mission's force contingent, its rule of law, political affairs, civil affairs and analytical teams, as well as with parts of the UN CT and other development actors.

Yet despite this long list of contributions, most development actors and independent experts on conflict minerals saw MONUSCO as a marginal or uninvolved player on these issues. This may be partly due to the downgrading of this issue's importance relative to other tasks in recent years. Most of the mandate language tasking MONUSCO with more direct support to interdiction, mine site validation or direct responses to illicit natural resources trade is to be found in pre-2016 resolutions. In more recent years, although the mandate has retained language related to addressing the link between mining issues, illicit trade and conflict, the issue has been largely de-prioritised and under-resourced. For example, several interlocutors noted that, although the mission maintained a dedicated natural resources specialist for several years, this amounted to a single staff position that was not funded through the regular budget.

This lack of prioritization, together with the way peace operations and related capacities were structured and deployed, helps explain why it proved so difficult to shift these underlying conflict economies or support complementary development approaches, despite the range of resources and capacities available. The discussion below examines these implications for 1) the mission's overall impact on addressing armed group capture of illicit natural resources, 2) the relationship and synergies between peacekeeping and development actors, and for two specific peace and security tools, 3) good offices capacities and 4) the sanctions regime.

Peacekeeping Efforts to Address the Armed Group and Natural Resource Nexus

The conclusion of the previous chapter was that development actors are ill-positioned to address the many political and security dynamics that can determine whether their responsible sourcing initiatives succeed. While peacekeeping missions in theory have a more applicable toolkit, the DRC experience suggests that peace operations may equally struggle to shift these underlying conditions. Many of MONUSCO's own efforts on conflict minerals were undermined by the same chronic insecurity, weak legal frameworks, and lack of State oversight capacities that frustrated development initiatives. For example, continued insecurity and fighting surrounding the mining sites, together with recurrent legal disputes, were the main challenges undermining the initiative of the pilot trading centres and mine site validation in the Kivus, which MONUSCO was deeply involved in supporting from 2010 to 2013.[164] Also similar to challenges faced by development actors, lack of government capacity or will stymied many of the initiatives MONUSCO supported, from the government trading centres initiative to mine site formalization,[165] as well as both MONUSCO and OSE-GL's good offices efforts to support regulatory reforms and regional cooperation. As one former UN staff member commented, these sorts of initiatives required a "willing partner on the other side".[166] Good offices are designed to build from some baseline of political will, not to generate it, he offered.

One UN staff member who had served with both MONUC and MONUSCO argued that it was not just a question of political will but also the "absorption capacity" of DRC government officials. He pointed out that MONUSCO had a very broad mandate, with offices in nearly every province at certain points, covering a wide range of issues and initiatives, each of which would have to be facilitated and taken up by local officials to be fully realized.[167] This was unrealistic in the environment in eastern DRC, he argued, regardless of whether there was sufficient political will and commitment.

Regional cooperation and regulatory reform require a "willing partner on the other side", one UN staff member reflected. Good offices are designed to build from some baseline of political will, not to generate it, he argued.

In such an environment, addressing the nexus between conflict and illicit natural resource exploitation would have required a more concerted application of the mission's political, security and analytical capacities, with sustained prioritization. Yet even during periods with more direct mandate language, addressing illicit natural resources exploitation and trade was never a clear priority focus. As a result, the mission's core tools and capacities have been oriented around taking forward the larger mission objectives – such as the protection of civilians, stabilization or addressing threats by illegal armed groups – with only incidental or indirect benefits for conflict minerals issues. The mission's coercive force capacities (such as the FIB) were designed to stop armed groups from threatening civilians, not to disrupt armed group capture of illicit flows. MONUSCO had substantial monitoring and analysis of natural resources flows and conflict linkages; but while these sometimes informed pilot initiatives or diplomatic engagement on natural resources issues, as a general rule, they were used to inform priority tasks like protection of civilians and DDRRR. They were not designed to generate or enable responses to conflict minerals, whether by the mission itself or by development actors.

Even when the mission was more directly engaged in responses like mine site validation or countering armed group capture of illicit trade, the limited prioritization of this issue affected the scale, geographic scope, duration and ultimate impact of these initiatives. For example, the heavily MONUSCO-supported initiative related to trading centres and mine site validation from 2010 to 2013 was limited to five trading centres, and a limited number of mining sites covering a limited area in the Kivus. The 2016 effort to disrupt armed group capture of illicit charcoal trade was a sectorally and geographically limited pilot that, while it enjoyed immediate success, was ultimately very short-lived. While positive steps, the short duration and limited scope of these pilot initiatives meant that they are not operating at a scale that could alter the larger conflict economies operating across eastern DRC.

Division of Labour Between Peacekeeping and Development Actors

The limited prioritization of these issues within the mission is also part of the explanation for why the division of labour between peacekeeping and development actors did not produce the sort of integrated, systemic effects on conflict minerals that these mission-CT relationships are presumed to provide. Some interlocutors framed the issue as one of lack of coordination and information-sharing, a common critique of peacekeeping-UN CT relationships. Yet these critiques do not fully explain the lack of synergy and integration. For many years, there have been a number of strategic frameworks designed to encourage integration between the mission and the UN CT, as well as across the range of UN and non-UN actors engaged in broader stabilization efforts.[168] While no doubt more could have been done to improve coordination and information-sharing within and across these frameworks, the larger issue is that such frameworks cannot fundamentally re-programme differences in the way that peacekeeping and development actors understand and respond to these issues, nor the degree to which such issues are prioritized vis-à-vis other goals.

As discussed above, MONUSCO generally approached conflict minerals through the lens of its broader protection, stabilization and armed group mandates rather than as a strategic problem in their own right. As a result, while the mission possessed capacities relevant for addressing conflict minerals issues, these were generally not deployed with a view to breaking the link between armed groups and conflict minerals, or to supporting responsible sourcing, formalization and livelihood initiatives. Where they did so, the effects tended to be incidental or opportunistic, and usually not on the scale or timelines needed. For example, MONUSCO might build a road to advance its PoC activities or facilitate logistical support; doing so might indeed also enable market access, but because it was not designed to do so, MONUSCO might not build the road (or adjacent secondary roads) in ways that would maximize the benefits for nearby responsible sourcing and formalization initiatives.

Development actors for their part generally approached conflict minerals as one element within broader livelihoods, environmental management and development interventions. Efforts to strengthen alternative livelihoods or formalize and certify mineral supply chains may contribute indirectly to reducing armed actors' access to revenue, but these initiatives are not typically designed around those objectives. Different risk appetites and organizational frames, in the sense of what UN CT entities see as their contribution or main focus of work, can also influence their willingness to collaborate on a project that addresses both the development and the hard security side of conflict minerals issues. “No one in the CT side wants to touch the two DDs of DDR with a ten-foot pole … even mining is seen as a dirty activity. They want to engage in more ‘feel-good’ activities that don’t involve armed groups or potential human rights concerns,” observed one interlocutor who had worked on these issues in the DRC for years.[169]

The differing funding incentives and organizational structure of the UN CT are also relevant. Although there are common strategic frameworks and overall coordination via the Resident Coordinator system, each UN entity in the UN CT still has significant autonomy, and on a day-to-day basis their work is often organized around project-specific outcomes. In addition, UN agencies and other related development partners often “compete for access to financial resources”, which limits the extent to which cross-cutting issues are treated as shared priorities.[170] All of this can make it difficult for development approaches to be oriented around addressing a specific structural issue or conflict driver like conflict minerals. Reflecting on this, one interlocutor noted that it can be a “difficult marriage” between the UN CT and MONUSCO because of these differing objectives and operating modalities, and because development actors “are not incentivized to keep tabs on the whole picture”.[171]

The result of these differing lenses, priorities and approaches is that conflict mineral interventions by the peacekeeping mission and the UN CT often evolved in parallel rather than as part of an integrated strategy. Because these issues get at the underlying operating logics, structures and priorities of peace and security actors on the one hand, and development actors on the other, they cannot be cured simply through strategic integration documents and coordinating structures.

Key finding

It has proven a “difficult marriage” between the UN CT and MONUSCO because development actors “are not incentivized to keep tabs on the whole picture”, one interlocuter noted.

Differing operating logics, funding modalities and priorities also create a more fundamental mismatch that prevents greater strategic effects.

In addition, while for both the peacekeeping mission and the UN CT, the issues surrounding conflict minerals were seen as substantial challenges, they were still one facet or problem within the much larger landscape of security, governance and development gaps that each side, respectively, was tasked with trying to address in eastern DRC. As one diplomat who engaged with these systems candidly observed, "Would coordination be helpful? Sure, but it wouldn't have solved the problem."[172] The deeply embedded nature of these governance issues, and the pervasive insecurity would have required a fundamentally different scale of engagement, he offered.

Regional Good Offices Capacities

The experience of MONUSCO and the OSE-GL in addressing the national and regional political dynamics surrounding conflict minerals and illicit trade in natural resources offers broader lessons regarding the design of regional good offices capacities. Beyond the effects of prioritization discussed above, it suggests that the way political engagement functions are distributed across field missions and regional political offices can significantly affect their ability to address inherently regional conflict systems.

Although MONUSCO was mandated to provide technical advice to the DRC Government on these issues, doing so meaningfully would have required engaging politically sensitive issues of corruption, collusion and other entrenched governance failures. Several interviewees noted that, particularly as relations between MONUSCO and the Government deteriorated in recent years, these issues came to be viewed as "too hard to handle" as part of the mission's political engagement with the DRC Government.[173] Under these conditions, MONUSCO's contribution increasingly shifted toward supporting political and technical engagement by other actors.

The introduction of the OSE-GL – which at times has had a designated technical support role on regional cooperation, including related to illicit trade in natural resources – would in theory bring additional good offices resources to bear, and those that are more independent of any one Member State's considerations and concerns. This would appear particularly important in moments like the present one. Illustrating the constraining effect of host State consent on good offices, since the M23 crisis broke out, at certain points the SRSG of MONUSCO was explicitly discouraged by the DRC Government from engaging directly with Kigali.[174]

On the other hand, while many valued the additional regional good offices capacities and technical support functions that came with the OSE-GL, others critiqued the way the OSE-GL was set up and the effect on the regional political environment. One interlocutor, for example, said that the existence of two UN missions made it easier for the different conflict parties and regional actors involved to go "shopping" for the diplomatic interlocutor that best supported their interests.[175] This fragmented the diplomatic landscape, he argued, and undermined the degree to which the mission could mediate and manage the regional political dynamics.[176]

Others argued that it was not the creation of two competing entities per se but the way the OSE-GL was set up, that hampered its ability to facilitate good offices, in particular its close identification with the PSC Framework. As relations between key ICGLR Member States have deteriorated, the PSC Framework has lost much of its political momentum. One former MONUSCO staff argued that this was not a new dynamic per se, but that the PSC Framework had long ago ceased to do more than issue "statements about commitments" that regional actors were not particularly committed to.[177] In such a context, he argued, the OSE-GL office and its associated function had become "irrelevant".[178] While not all shared this opinion, even those who saw a space for technical support with the ICGLR – noting that many technical mechanisms continued to function at the working level even at the present moment – observed that the erosion of trust and willingness to cooperate among Member States substantially reduced their effectiveness.[179]

The experience of MONUSCO and the OSE-GL suggests that regional political engagement should be considered an integral component of responses to cross-border conflict systems. At the same time, simply establishing a regional political office is unlikely to be sufficient unless it is designed with the political authority, institutional relationships, staffing and mandate commensurate with the regional challenge it is intended to address, and retains sufficient flexibility to remain relevant as regional political processes evolve. While overlapping political capacities between a regional office and a country-based mission need not be problematic, their respective roles and comparative advantages should be clearly defined to avoid duplication, forum shopping and fragmented political engagement.

Cross-Border Pressure and Enforcement via Sanctions and Group of Expert Monitoring

One of the Security Council-created tools with the longest and most appreciated track record is that of the Group of Experts linked to the sanctions regime, as well as the Panel of Experts that preceded it. For more than two decades, the Group of Experts' reporting has helped identify and connect patterns of illicit natural resources exploitation and armed group support – supporting diplomatic engagement, prompting private sector and development responses to the issue of conflict minerals, and sometimes creating pressure points through application of sanctions.

However, while the work of the Group of Experts was generally lauded, many saw the lack of uptake by the Group of Experts' recommendations as an indicator of the lack of political will on the part of Security Council members to seriously address regional interference and political-economy drivers in the Great Lakes. In addition, there were mixed views on whether, if they had been applied more often, sanctions could be used to address the incentives of conflict actors in relation to illicit natural resources trafficking and exploitation. "Something could have been done had sanctions been applied earlier on," one former MONUC and MONUSCO staff member argued.[180]

However, other interviewees questioned whether greater use would have broken the link between armed group support and illicit supply chains. One eastern DRC researcher said he saw little evidence that the recent unilateral sanctions placed on businessmen or corporations (on the grounds that gold trafficking or other illicit natural resources profits have benefitted armed groups) were having the desired impact.[181] To illustrate this, he gave the example of a private sector actor who had been sanctioned by non-UN sanctions authorities in recent years; he observed that though the individual in question regretted the ban on foreign travel (given he maintained a home base in Europe) his business interests were unaffected. Other countries – for example, China, the Gulf countries, Türkiye or other countries that function as mineral transit hubs – are not required to respect or enforce Western sanctions. This, plus the overall weak enforcement system and porous borders, meant that the sanctioned individual could continue to export, largely via Rwanda, to China, the Gulf and other countries, regardless of the sanctions. The same researcher observed that the more that companies find these work-arounds, and find that they can continue business as usual despite the sanctions, the less deterrent effect sanctions will have.[182]

An additional critique raised was that greater application of sanctions could inadvertently undermine some of the other efforts to stimulate and encourage licit channels of production and export of minerals. Some of the efforts discussed in chapter 2, for example, were aimed at de-risking banking and investment in the mineral sector in DRC. Sanctions in a given country or sector can produce the opposite effect. Even if the sanctions are unlikely to affect a particular strand of activity – for example, due to clear exemptions or listing criteria – there is a tendency among the private sector toward "over-compliance" for fear of financial penalties.

Although not linked to international sanctions, there was a clear example of the risks of this "over-compliance" in response to past regulatory pressures in the DRC. Following repeated international pressure to address the conflict minerals issues (driven in large part

> **Key finding**
>
> There has been a greater application of sanctions related to the natural resources-conflict nexus since the M23 crisis; however, this may not be a positive development. One researcher observed that those sanctioned have easily found work-arounds. The more they do so, the less deterrent effect sanctions will have, he observed.
>
> Sanctions can also undermine other development and private-sector responses to conflict minerals by creating risks of over-compliance that discourage legitimate investment.

by Group of Expert reporting), the DRC Government introduced domestic penalties to try to shut down armed group involvement in illegal mining in eastern DRC in the early 2010s. Although the ban was unsuccessful and quickly withdrawn, one study noted it had an overall negative effect on the mineral trade as a whole in the years following: "Buyers in the international 3Ts market had become afraid of damaging their reputations due to the controversy surrounding conflict minerals and moved their sourcing away from the DRC. This is often referred to as the 'de facto embargo' on Congolese 3T minerals."[183] The risk illustrated by this example is that had UN sanctions been applied more stringently, it might have actually undermined some of the other development-oriented approaches to conflict minerals. While there is no perfect remedy or balance for this, it does illustrate the larger point that for these different peace and security tools to actually constrain illicit trafficking they have to be in sync with each other.

Regional and Cross-Border Structural Constraints

Nearly all of the principal peace and security actors and mechanisms in the Great Lakes region incorporated regional engagement or cross-border response into their mandates or institutional design – from MONUC and MONUSCO having scope for regional good offices and engagement, to the creation of a fully regional special political mission with the OSE-GL and the DRC sanctions regime incorporating cross-border trade into its listing criteria. The key diplomatic frameworks and mechanisms, the ICGLR and PSC Framework likewise reflected this regional approach.

Yet despite MONUSCO's mandate including some scope for addressing regional dimensions of armed group support and illicit natural resource flows, its operational and political centre of gravity remains the territory of the DRC. It can support activities in mining areas, contribute analysis on cross-border dynamics and facilitate stabilization, including in borderland areas where trafficking and armed group capture occurs. However, it has limited reach over the actors, markets, political relationships and enforcement decisions on the other side of the border that also shape illicit mineral flows. Its dependence on host State consent has further constrained its ability to engage in regional political issues, particularly where these involve sensitive relations between the DRC and Rwanda.

The OSE-GL is not confined by a single host State mandate and is explicitly designed to facilitate regional cooperation across the Great Lakes, but it faces a different set of constraints within the regional setup and environment that it is tasked with addressing. Fundamentally, the regional mechanisms the Special Envoy is tasked with supporting depend on the continued cooperation of multiple Member States, any one of which can slow, block or withdraw support at any time. The only counterbalance to the variable commitment of regional stakeholders is the diplomatic standing of the Special Envoy and sustained political backing from the Security Council. When that backing exists, OSE-GL can play an important traffic-conductor role by convening actors, sustaining technical follow-through and coordinating implementation of regional commitments. When it weakens, the office can continue to facilitate technical cooperation, but it has few means of generating the political momentum needed to overcome regional disagreements.

A possible counterpoint to the State-based limitations of peacekeeping missions is that the wider UN development and peacebuilding architecture is less constrained by a single-State territorial mandate, and may have more reach in borderlands. In many situations, there are UN CTs operating on both sides of the border, in neighbouring States (for example, in Rwanda and DRC), and many agencies maintaining field presences in borderland areas. However, as touched upon in chapter 2, in practice development actors tend to be equally State-based in their operationalization of programming. There are few streams of funding that enable cross-border development or peacebuilding work across these UN structures and

Key finding

Peacekeeping missions and development entities tend to operate within national confines, limiting their ability to address cross-border conflict ecosystems.

Regional special political missions face a different dilemma: though less geographically constrained, their efforts depend on the continued cooperation of multiple Member States, any one of which can slow, block or withdraw support at any time.

entities. Even those that do exist – for example, the Peacebuilding Fund's cross-border funding window – will still be taken forward by nationally organized offices of UN CT members, who tend to work largely on programming on their side of the border.[184] In practice, this often results in parallel programming on either side of the border rather than genuinely integrated interventions targeting the common regional system as a whole.

Key Take-Aways on Peace and Security Actors' Responses to the Natural Resource-Conflict Nexus

- **Peacekeeping missions have a broader range of capacities for addressing conflict minerals than is often recognized.** The experience of MONUC and MONUSCO suggests that peacekeeping missions have a lot to offer in terms of addressing conflict minerals issues, through a much broader range of functions than is often recognized. Where conflict mineral issues were explicitly linked to mandate priorities, MONUSCO was able to deploy political, security, logistical and governance capacities in a more deliberate and coordinated manner.
- **Peacekeeping missions may have a particular comparative advantage in their ability to bring these different capacities together.** This was illustrated by the 2016 pilot initiative to disrupt armed group capture of the illicit charcoal trade, which combined security, law enforcement and market-based responses through coordinated efforts by the mission's force contingent, rule of law, political affairs, civil affairs and analytical teams, alongside parts of the UN CT and other development actors.
- **However, the mission's mandate has only enabled these more active forms of engagement for limited windows of time, and without a high degree of prioritization, limiting strategic effects.** More active engagement was enabled for only limited windows of time, and addressing illicit natural resources exploitation was never the priority response to armed group dynamics within the mission. Interventions were therefore not large-scale, widespread or sustained enough to shift deeply rooted conflict economies and support.
- **Peace operations also struggle to shift the larger security, governance and political will constraints that limited development responses.** While peace operations have more security and political engagement capacities than development actors, these were insufficient to overcome the larger security, governance and political will constraints in environments like the DRC, particularly without sufficient prioritization.
- **Conflict minerals cut across peace and security and development priorities, creating critical areas of complementarity between peace operations and development actors.** Development actors highly valued MONUSCO's security presence and logistical capacities as enabling their initiatives and responses. Other MONUSCO activities – its support for road construction, quick impact projects and stronger legal frameworks – also addressed clear development and governance gaps. Development and private sector actors, in turn, were better positioned facilitate alternative livelihoods or responsible sourcing measures, helping limit conflict financing pathways.
- **Such synergies, however, did not on their own produce integrated responses, nor were coordination frameworks sufficient to bridge the gaps.** This calls into question a common assumption in UN peace operations: that multidimensional peacekeeping missions and UN CTs naturally provide complementary capabilities which, if better coordinated and integrated (for example through Integrated Strategic Frameworks (ISFs) or other coordination platforms), could collectively provide a potent response to complex political-economy problems. Better coordination and information-sharing would no doubt help. Yet the evidence from the DRC suggests a more fundamental challenge. Peacekeeping and development actors approached conflict mineral issues through different mandates, incentive structures and operational logics. These differences cannot simply be overcome through stronger integration frameworks or coordination mechanisms.
- **The State-based structure of peace and security responses limits their ability to address inherently regional and cross-border conflict economies.** The peace and security architecture around eastern DRC has long recognized the regional nature of the conflict, and successive peace operations, sanctions mechanisms and regional frameworks have been mandated at least in part to respond to regional political-economy dynamics.

> Despite this, each of these instruments or actors remain anchored in a State-based system. This structural constraint, as well as deference to sovereign prerogatives and weak political support and resourcing, has repeatedly undermined the reach and effectiveness of cross-border mandates and mechanisms.

The experience of MONUC, MONUSCO and other peace and security actors in the DRC points to a broader lesson about the UN system's ability to respond to conflict-related political economies. It demonstrates both the breadth of peace and security tools that can be brought to bear – including peacekeeping mandates, sanctions regimes, monitoring mechanisms and regional political engagement – and the limits of those tools in practice. Simply incorporating conflict minerals into mandates or political frameworks was not sufficient. Their contribution ultimately depended on the wider political and institutional environment in which they operated. Even where MONUSCO possessed relevant capabilities, their effectiveness remained contingent on government cooperation, sustained political backing from Security Council members, functioning regional cooperation mechanisms, and complementary action by development and regulatory actors. Taken together, these findings shift attention beyond the capacities of individual peace operations to the broader question of how the international system structures, supports and coordinates the political, security, development and regulatory capacities needed to address regional conflict systems. This broader question is taken up in the concluding section.

IV. Concluding Themes and Implications for Policy and Programming

Collectively, a range of development and peace and security actors have generated a remarkably diverse set of responses to conflict minerals over the past two decades, ranging from mine site validation, certification and responsible sourcing initiatives to operations, tools or mechanisms that place security, financial and political pressures on armed group networks and their financiers. Yet these initiatives have struggled to shift the fundamental dynamics surrounding natural resources–related conflict economies. Two recurring challenges emerge from this study. First, development, peace and security, market-based and diplomatic interventions each address different dimensions of the problem but have rarely been aligned in ways that generate mutually reinforcing and systemic effects. Second, the fundamentally regional and cross-border nature of these mineral economies consistently outstrips the reach of nationally bounded interventions, on the side of both peace and security actors and development approaches. A third cross-cutting challenge that plays out both in the national and regional spaces is the degree to which these interventions can overcome issues of political will among the stakeholders involved.

These key conclusions are expanded upon below, followed by a section on future directions, policy implications and recommendations.

Peace Operations, Development Interventions and Conflict Economies

The paradox of the conflict minerals issue in the DRC is twofold: to fully address key conflict drivers in the DRC, peacekeeping actors would have to be able to deliver or shift development and governance outcomes, in ways that they are not necessarily equipped for. On the other hand, to nurture and sustain successful alternative livelihood and economic strategies, the underlying political and security environment would also have to shift, which development actors are equally ill positioned to affect. This would appear to create a natural division of labour, with the peacekeeping mission taking on more security and political tasks, and development actors taking up more economic or long-term peacebuilding measures.

The experience in the DRC suggests that this division of labour will not naturally materialize in practice due to deeper structural constraints. Having the peacekeeping mission working in its lane, the UN CT in theirs, and other non-UN development actors and private sector initiatives taking forward their work does not automatically generate the sort of comprehensive response needed to address a multifaceted and deeply entrenched issue like conflict minerals. Nor can this be addressed by having integrated frameworks aligning UN CT and peacekeeping objectives. Because each sector's tools and approaches are not oriented around addressing the combined challenge presented by conflict minerals, nor aligning with each other to do so (where necessary at the expense of other priorities), the responses will always be slightly out of sync, and fall short of the scale and systemic effect needed.

This mismatch or misalignment reflects fundamental differences in objectives, time horizons and operational structures between peace and security and development actors. While illicit natural resource exploitation was frequently understood as a driver of insecurity, armed group mobilization, civilian harm and instability – and this was at times explicitly reflected in MONUSCO's mandate – peacekeeping missions are not principally structured around transforming the political and economic systems that sustain such conflict economies. Even where mandates explicitly recognized links between natural resources and conflict, the mission's incentives, reporting structures and measures of success remained tied primarily to protection, stabilization and political objectives. Questions of mineral governance, illicit trafficking and conflict financing were therefore generally approached through the lens of those priorities, rather than as political-economy challenges requiring sustained attention in their own right.

There is also a more short-term logic to peace operations' activities. While missions are intended to contribute to longer-term conflict transformation, their day-to-day focus and strategic attention are often dominated by servicing immediate mandate tasks (which are metered by annual mandate renewals) and reacting or responding to rapidly evolving political and security dynamics. Challenges such as conflict minerals, by contrast, require sustained efforts to reshape governance arrangements, economic incentives and patterns of political behaviour over long periods of time. This creates a structural mismatch between the operational rhythms of peacekeeping missions and what is required for long-term transformation of the political economy.

Development actors, by contrast, are organized around a different set of objectives, time horizons and operating assumptions. While their work on alternative livelihoods, strengthening market access and formal mineral supply chains, or other governance and land reforms could contribute to reducing armed actors' opportunities for revenue capture, these interventions are not typically designed around those objectives. Efforts to strengthen alternative livelihoods or formalize and certify mineral supply chains may contribute indirectly to reducing armed actors' access to revenue, but these initiatives are not typically designed around those objectives. Where trade-offs emerge between addressing these conflict-related issues and other development priorities, the latter will generally win out. This can result in a situation where development objectives are advanced without disrupting conflict prevention dynamics. For example, formalization and market access benchmarks may be met, but if armed actors then adapt by capturing revenue streams at a different part in the supply line, the underlying conflict-financing dynamics remain.

In addition, unlike a peacekeeping mission, the broader development field lacks a single coordinating authority capable of directing collective action around a shared political objective. UN agencies, bilateral donors, international financial institutions, NGOs and private sector actors each operate according to their own mandates, funding streams, organizational incentives and performance metrics. Additionally, while the development field as a whole can be more long term in orientation, on a day-to-day basis it is often project-driven, and subject to donor interests. This, plus the more diffuse nature of the sector, can mean that while development actors possess many of the tools needed to address the long-term and more systemic economic and governance drivers underlying conflict minerals, their tools, strategies and objectives are generally out of step with those of a peacekeeping mission.

These differing operational logics have often produced parallel rather than integrated approaches. Rather than peacekeeping and development actors acting in a complementary way, bringing their differing toolkits and expertise to bear collectively, each has largely pursued their own priorities and mandates, with large gaps in the overall response to conflict minerals.

An additional piece to this is that across these different actors, their capacities and resources were not oriented around addressing conflict minerals as a priority issue. Conflict economies are fundamentally political systems that distribute power, revenue and influence. As a result, addressing them cannot be undertaken as a technical governance or economic regulatory issue alone, nor as a peripheral component of stabilization strategies. Because conflict minerals issues are tied to the key interests of a range of stakeholders, effectively addressing them would require a different level of prioritization and support on the part of both sets of actors.

Cross-Border Dynamics Against Community, Conflict and Regional Realities

Mineral-driven conflict in eastern DRC is structurally transnational. Miners, traders and communities experience interconnected borderlands as one geographic and economically connected space. Supply chains traverse porous borders and incentives are shaped by regional price differentials, enforcement asymmetries and the financial and political interests of actors on both sides of the border. Yet most interventions remain anchored to particular jurisdictions and operate under geographically contingent mandates. As a result, peace operations and development actors alike often struggle to influence the broader systems of incentives and relationships that sustain conflict economies, even where they possess nominally cross-border mandates.

The regional nature of mineral economies generates a complex regulatory challenge, especially in a regional environment like the Great Lakes region. If taxes, fees and payments are not harmonized both locally and regionally, it can create cross-border arbitrage incentives that encourage illicit trade. Yet addressing these dynamics would require a degree of sustained regional coordination, regulatory alignment and enforcement cooperation that has been difficult to achieve in the Great Lakes region given both recurrent political tensions, waxing and waning levels of political commitment and will, and underlying economic incentives that may run against economic integration and harmonization. The success and drawbacks of the RCM as a regional regulatory mechanism illustrate some of these broader challenges. While the RCM can create mechanisms for reporting, transparency and certification, it is not positioned to bridge these larger gaps in political will and cooperation among regional players, nor to police and address recurrent implementation gaps, such as limited verification, weak or inaccurate reporting and lack of transparency around export volumes.

Yet the limitations of regional mechanisms are only part of the challenge. Many of the factors that sustain illicit mineral flows originate at the community and mine site level, where regional governance frameworks have limited reach. Mechanisms such as the RCM can help coordinate standards, reporting systems and regulatory approaches across States, but they are not designed to address the localized livelihood pressures, governance grievances and informal economic relationships that shape participation in mineral economies on the ground.

Development actors are well positioned to operate at the community level, sometimes with the support of MONUSCO and other peace and security actors (for example, through stabilization activities). However, conditions at a particular mine site or community are often shaped by factors operating far beyond it, including regional price differentials, access to informal buyers and sources of credit, illicit taxation along transport routes, corruption, insecurity and differing enforcement practices across jurisdictions. These wider incentives frequently determine whether miners and traders participate in licit or illicit supply chains or whether other development-oriented interventions at a community level succeed, yet they are largely outside the control of those working at the community level.

Overall, what this overview of efforts in eastern DRC illustrates is that, while mineral communities, trading systems and illicit mineral flows straddle borders, most interventions do not. Limitations on both development actors and peace operations in responding bi-nationally or across borders constrain their ability to address the political-economy and conflict dynamics that emerge within borderlands.

Future Directions and Recommendations

These findings have a number of policy implications, both immediately for the current peace process and ceasefire implementation discussions in the DRC, and for those considering future models for peace operations or other strategies for responding to regional conflict-economy dynamics.

The Doha Framework, Ceasefire Implementation and Future Peace Processes in DRC and the Great Lakes

DRC's mineral wealth has been a key issue in the recent M23 crisis in eastern DRC, and in the peace talks surrounding its resolution. As this report was being finalized, the parties took initial steps towards operationalizing monitoring and verification arrangements under the Doha Framework, while negotiations continued over the implementation of broader commitments concerning the withdrawal of foreign forces, the disengagement of M23 from occupied territory, the cessation of support to armed groups and the transition of areas currently under M23 control. Following further talks in August 2026, the DRC Government and M23 agreed on a roadmap for implementing existing commitments and negotiating the remaining protocols, while the Expanded Joint Verification Mechanism Plus (EJVM+) (the ICGLR mechanism established to monitor and verify implementation of the ceasefire) began its first ceasefire verification mission.[185] These arrangements are especially significant for strategically important mining areas such as Rubaya, which has been a major site of military contestation both in the lead-up to M23's seizure of territory and during renewed fighting in 2026. These negotiations present a rare opportunity to incorporate lessons from more than two decades of international engagement with conflict minerals into the design not only of the immediate ceasefire and its implementation, but also of a broader peace settlement.

Previous cycles of conflict in eastern DRC show that military disengagement and ceasefire arrangements are unlikely to produce durable peace if the underlying conflict-financing systems remain intact. As discussed in the background section, following the Second Congo War, the UN Panel of Experts warned that a "self-financing war economy centred on mineral exploitation" meant that armed groups and many of the political and commercial interests supporting them would have little incentive to demobilize permanently, a prediction that sadly came to pass.[186] The aftermath of the 2012–2013 M23 crisis offered a similar lesson: although M23 was temporarily dismantled, the broader mineral economy underpinning conflict in eastern DRC was not brought under control, and gold became an even more important source of armed group financing in subsequent years.

Recent developments suggest even more reason to be concerned about these regional political-economy drivers in the current moment, compared with previous cycles of conflict. Both UN reporting and independent analyses suggest that a substantial expansion of illicit mineral exports from eastern DRC has followed M23's seizure of territory, with the UN Group of Experts and others reporting unprecedented levels of coltan, gold and other minerals being smuggled into Rwanda and exported as domestic production.[187] This suggests that regional economic interests linked to eastern DRC's mineral economy have expanded rather than diminished since the previous M23 crisis, making these conflict-financing systems potentially even more difficult to dismantle absent concerted international pressure and engagement on this issue. Some of these regional political-economy dynamics are already recognized in the parallel economic agreements negotiated as part of the Washington process. The REIF between the DRC and Rwanda includes commitments concerning mineral-supply-chain transparency, the harmonization of tax and regulatory regimes, customs and law-enforcement cooperation, formalized cross-border trade and the possible creation of joint special economic zones.[188] The critical next steps will be how these commitments and aspirations (the REIF is non-binding) are effectively connected to the Doha process and the implementation of ceasefire arrangements, as well as how a foundation is laid for carrying forward these largely prospective commitments.

On the former, consideration for these political-economy dynamics, and attention to the potential conflict triggers surrounding sites connected to the extraction and export of natural resources must be built into any ceasefire monitoring and future political settlement discussions. Already in 2026, there have been several outbreaks of fighting surrounding the mineral-rich coltan site of Rubaya, and in the towns that make up access roads to it.[189] Best practices in terms of ceasefire verification arrangements emphasizes the importance of identifying patterns of military build-up or particular geographic locations that represent sites of contention or potential tripwires, and explicitly building these into the terms and protocols of any ceasefire agreement and monitoring plan. In eastern DRC, this would mean building identification of strategic mining areas and armed activity surrounding them (for example, attempts to retake or retain control over such sites, or armed group build up and advances near these sites and connected trade routes) into the tripwires of the ceasefire monitoring plan. Any interim security

Key recommendation

Ceasefire monitoring should explicitly identify strategic mining areas and connected trade routes as potential conflict tripwires, and monitor military mobilization or escalation around them.

The proposed trigger- or consent-based monitoring system for the EJVM+ may be particularly ill-suited to this situation, as actors benefiting from their control have little incentive to report violations or facilitate investigations.

arrangement will also have to give specific consideration to the handover of these sites, or adjacent areas, from M23 control.

The effectiveness of these mining-related or political-economy-related tripwires depends on the design of the ceasefire monitoring mechanism itself. Under its current design, the EJVM+ (which began field verification activities in August 2026) operates principally as a “trigger-based” or “fire alarm” system of monitoring, in which the EJVM+ investigates violations only when alerted to an issue (rather than regular monitoring and patrols to detect such violations). It also may only do so with the consent of all parties. Whether they will be alerted to all relevant developments, and receive permission to investigate them, is particularly questionable in relation to strategically important mining areas, where those benefiting from illicit exploitation or continued control may have little incentive to report violations or facilitate investigations.

These immediate ceasefire and interim security arrangements should then be followed by a longer-term strategy for addressing the regional political economies that pose the greatest risk of conflict recurrence. As others have similarly observed in relation to the Doha process, many of the structural drivers of conflict will necessarily require a wider political and economic process extending well beyond the ceasefire itself.[190] If there is a moment to consider the lessons from this report, and to reconnect peace and security tools with development, regulatory and responsible-sourcing interventions, it is the present one. This would include reviving or expanding many of the tools and approaches discussed in this report. Responsible sourcing initiatives and private sector due diligence frameworks, supporting regulatory and legal reforms relating to mining governance, concession rights and artisanal mining, community development initiatives at mine sites, strengthening mine site governance and alternative livelihoods, and mechanisms for addressing longstanding community grievances and disputes over land and mineral rights would all be necessary components for seeing through the commitments in the REIF. Better integrating these with peace and security strategies – for example, stabilization strategies or DDRRR strategies that incorporate alternative livelihood and community integration perspectives – would help ensure that these economic development and investment processes devolved in ways that posed a lessor risk for conflict recurrence. A final piece is reviving regional cooperation frameworks. Although the REIF references existing ICGLR mechanisms, translating these commitments into practice will require renewed diplomatic engagement, technical support and political investment to rebuild regional cooperation after years of disruption and disuse.

The findings from this study also identify some options in terms of what role MONUSCO might play in any such arrangements. Although MONUSCO, alongside other UN representatives, has been invited to participate in the Doha Framework discussions, the recent Memorandums of Understanding have not yet identified a particular role for MONUSCO. In addition to its much longer engagement in supporting ceasefire implementation in the DRC, this study has highlighted that MONUSCO possesses a number of security, political and analytical capacities that could help reduce the role of conflict financing in sustaining armed violence and support the implementation of ceasefire and stabilization arrangements. This can range from deploying force contingents in ways that disrupt armed group capture or predation at mine sites or along supply routes, to using monitoring, analysis, good offices and other political capacities to address the broader crime-conflict nexus and regional economic linkages. These are capacities that complement, rather than duplicate, the verification role envisaged for the EJVM+, by helping support the security and political conditions within which longer-term governance, development and economic initiatives can take root. Any such support could be directed towards enabling the Government of the DRC to restore State authority and

Key recommendation

Seize the opening created by the economic focus within peace talks to reinvigorate a longer-term strategy for addressing the conflict-financing systems that sustain violence in eastern DRC. The REIF, alongside tentative signs of greater political will, offers an opportunity to make these political-economy drivers a strategic priority and build more integrated peace and security, development, regulatory and responsible-sourcing approaches around them.

advancing nationally owned stabilization and development priorities, ensuring that MONUSCO's contribution supports the broader peace process rather than any particular economic agenda.

The question of whether MONUSCO, or any actor, might be enabled to address the underlying regional political-economy issues begs a larger question of whether the political will for tackling such issues exists. Throughout much of the period examined in this study, there was only limited willingness among Security Council members and other key international actors to directly confront the cross-border economic interests sustaining the conflict, or to place meaningful political pressure on regional actors benefiting from these systems. This broader political context inevitably shaped the extent to which MONUSCO, sanctions regimes and other international mechanisms were expected, or politically supported, to engage on these issues. Tentatively, there are some indications of a greater appetite for addressing such issues. The Security Council's February 2025 resolution responding to the outbreak of the conflict both directly condemned Rwandan support and involvement and the continued illicit trafficking of natural resources, connecting this with the conflict drivers.[191] Over this period, the United Kingdom, the European Union and the United States have appeared increasingly willing to consider the use of sanctions against regional actors in connection with illicit trade in natural resources, both as part of the UN sanctions regime and in their application of their own sanctions authorities. Since coming onto the Security Council as an elected member, the DRC has sought to garner greater attention to this issue, including through a high-level debate on natural resources governance and peace and security implications held in July 2026, the month in which the DRC held the Council presidency.[192] These steps could signal more of an opening for addressing the regional political economy of conflict in the Great Lakes region.

Future Models of Peace Operations or Other Responses to Regional Conflict Economies

Key questions considered in this study were whether and how peace operations might respond to a regional political-economy challenge like conflict minerals, and how peace operations' capacities can best be combined with other development, governance and regulatory interventions. The responses to these questions offer insights for ongoing debates about the future of peace operations, and the different models of peace interventions that might be considered.

The DRC experience suggests that where regional political economies are identified as central drivers of conflict, peace operations can make a distinctive contribution. Where there is sufficient support for this in the mandate, a peacekeeping mission's security presence and other analytical, logistical and political support capacities could have a significant impact in supporting development initiatives and other regulatory responses. The mission's ability to combine such field-based resources with political engagement capacities at a national and regional level would offer a powerful combined set of tools for addressing such complex, multi-dimensional issues. However, they are only able to make full use of these comparative advantages where clearly mandated and resourced to do so, where the issue is treated not as a peripheral or secondary priority but as a clear mission priority, and where the issues are given sufficient political backing and support. A recurring lesson was that addressing regional political economies inevitably touches politically sensitive questions of State interests, regional relations and economic influence. As a result, peace operations are unlikely to engage these issues effectively without sustained political backing from the Security Council and other influential international actors.

In terms of synergies with development actors, the central lesson was that coordination and integration frameworks are helpful, but they cannot bridge the underlying differences in mandates, incentive structures and operational logics across peacekeeping and UN CT actors. As a result, on an issue like conflict minerals, peace and security and development actors are unlikely to generate genuinely synced responses unless both identify the issue as a strategic priority. While even this would not automatically result in fully integrated programming, it would at least open the space to design more integrated or complementary combined security and development interventions around the disruption of conflict-economy dynamics.

Whether either development actors or a peace operation would be positioned to treat such issues as a strategic priority – to be advanced at times above other goals and priorities – raises slightly different issues for each. Peace operations have typically not been designed with a view to addressing long-term and structural political-economy issues, and the Security Council has appeared reluctant to use peace operations in this way. Notwithstanding the recent signals of some Council members' willingness to consider these issues to a greater extent in the DRC, the current geopolitical moment is one where foreign policy agendas appear increasingly transactional, and oriented around combined military-economic agendas. In such a period, securing sustained international consensus around interventions that seek to reshape regional political economies may prove even more difficult than during earlier periods.

Key recommendation

While proposals for more focused or "modular" designs in peace operations may enable greater specialization and prioritization, technical capacities are no substitute for the political mandates and backing needed to address deeply entrenched conflict economies.

Nonetheless, recent proposals to shift to peace operations with more tailored mandates and "modular" approaches suggest openness to designing and developing new types of missions, including those that might have more of an orientation toward addressing crime-conflict nexus issues or more political-economy-rooted conflict drivers. Organizing missions around more focused objectives or mission sets may help address some of the prioritization and synchronization challenges that prevented more integrated conflict mineral strategies in the DRC. However, the move toward more tailored and limited missions should not become a predominantly technical exercise. Ultimately, missions will only succeed in being able to address such complex political-economy issues if they also retain the political tools, leverage and backing needed to shape the wider enabling environment in which those technical capacities operate.

On the side of development actors, the issue is one of coherence and collective alignment rather than authorization. The priorities of development and private sector actors cannot be directed in the same top-down, mandated manner as peace operations. Nonetheless, as this study has documented, there have been periods of time when private sector and development actors have placed a greater focus on responsible sourcing and other development responses to conflict minerals. That degree of alignment could potentially be encouraged again through a combination of sustained political support from Security Council members and other influential States, dedicated funding that incentivizes joint approaches, and continued regulatory pressure in downstream markets.

A final set of insights concerns not only what this study says about peace operations, but what it suggests about the ability of peace and security strategies more broadly to respond to conflicts that are becoming simultaneously more transnational and more deeply embedded within regional and global political economies. Contemporary conflicts are increasingly intermeshed transnational systems of illicit trade, organized crime, environmental exploitation, trafficking networks and resource extraction. These cut across political, security and development domains while also transcending national borders. What this case highlights is that the international system still lacks institutions or mechanisms specifically designed to engage regional political economies as integrated systems. The range of mechanisms discussed – from peace operations, to sanctions, to development initiatives and programmes – tended to be designed for and operated within designated national territorial boundaries. Those with a more regional focus were repeatedly constrained by sovereign prerogatives, political caveats or limited resourcing that prevented them from acting in a genuinely transnational manner. Future peace interventions will therefore increasingly require institutions or mechanisms that are designed to operate across regional political, security and development systems, rather than within the national and sectoral silos through which international responses have traditionally evolved.

Recommendations

To those engaging in the current peace talks and other efforts to address conflict triggers in the DRC and broader regional tensions in the Great Lakes:

- **Revisit MONUSCO's mandate and capacity to respond to conflict minerals.** Given the continuing role of conflict-financing in the current crisis, the Security Council should review whether MONUSCO's mandate provides sufficient authority, prioritization and resources to address these dynamics, and whether it might be appropriate to revisit some of the past modalities for addressing the crime-conflict nexus and illicit natural resource chains. Even without restoring some of the more ambitious efforts, filling and sustaining (through regular budgetary support) the post of a natural resources advisor could be critical given ongoing dynamics.
- **Embed conflict-economy triggers in ceasefire design and implementation.** Those engaged in the Doha Framework negotiations must explicitly identify conflict drivers in relation to natural resources, and build these into the ceasefire monitoring and implementation plan, including by:
    - Ensuring that the ceasefire provisions and monitoring and verification protocols explicitly identify and incorporate indicators and tripwires related to strategic mining areas, transport corridors and other sites associated with armed group financing, and that the mandate, terms of reference and deployment modalities of the monitoring mechanisms are adequate to monitor these provisions. This may require revisiting the current trigger- and consent-based deployment model of the EJVM+.
    - Developing dedicated interim security arrangements for strategic mining areas, transport corridors and other economically significant sites to support their secure transition from M23 control. Given this study's findings regarding both armed group and FARDC predation at such sites, consideration should be given to whether temporary handover to a neutral actor, such as MONUSCO, would better reduce risks of renewed violence during the transition period.
    - Ceasefire monitoring and verification mechanisms, as well as MONUSCO monitoring and analytical capacities, should monitor broader conflict-economy dynamics – including non-military developments at strategic mining areas, transport corridors and mineral supply chains – as early warning indicators of ceasefire erosion, renewed armed group mobilization and emerging conflict risks.
- **Lay the groundwork for longer-term conflict minerals responses.** Those involved in the peace process should begin identifying the institutional, governance and development measures that can be initiated during the current implementation phase to progressively reduce dependence on conflict-financing systems and begin operationalizing the commitments contained in the REIF. For example, in developing DDRRR strategies and mechanisms, as well as other stabilization measures, consideration should be given to how conflict parties may continue to access mineral revenues through proxies, illicit taxation or cross-border diversion. These risks might be further reduced by complementary governance, regulatory and development measures and programmes.
- **Reinvigorate complementary development responses.** Many of the initiatives examined in this report – including responsible-sourcing and due diligence frameworks, mine site governance, mining-sector and concession reforms, community dispute-resolution mechanisms, alternative livelihood programmes and regional trade and development initiatives – could help translate the REIF's broader economic commitments into practical implementation. However, in doing so it will be important to ensure that security, governance and economic measures are designed as mutually reinforcing components of implementation rather than separate tracks.
- **Support more cross-border funds and programming.** As part of this, Member States engaged in supporting peacebuilding and broader development activities in the DRC might consider financing more cross-border programming and analysis related to conflict minerals, recognizing that many of the political, economic and security dynamics driving conflict mineral economies operate across national boundaries.
- **Encourage greater uptake and action on Group of Experts findings.** To enable better calibration of responses to conflict economies, the Security Council should consider greater attention to and action on Group of Experts recommendations regarding conflict minerals financing networks and cross-border supply-chain actors, either in application of existing sanctions mechanisms or in recommending other diplomatic or operational responses.
- **Plan for conflict minerals analysis and responses post-transition.** Mission leadership should ensure that MONUSCO transition planning explicitly considers how conflict minerals monitoring, regional political

engagement, and armed group financing analysis will be sustained following the mission's drawdown, including through appropriate continuity and handover arrangements.

- **Strengthen regional frameworks for cooperation and engagement.** The Security Council, Member States of the ICGLR, and other interested international actors must do more to strengthen regional frameworks and their mechanisms, including:
    - Regional Governments should renew their commitment to implementing the ICGLR RINR, including through greater transparency in mineral production and trade data, and full participation in its regional certification, information-sharing and oversight mechanisms.
    - Building on the establishment of the ICGLR ad hoc Commission of Inquiry on allegations of smuggling of 3T minerals and gold, regional Governments should cooperate with regional investigative and oversight mechanisms aimed at strengthening transparency and accountability in mineral supply chains.[193]
    - ICGLR Member States and donors should renew their support for the ICGLR technical functions and platforms, including fully funding and sustaining the RINR tools and other regional certification platforms.
    - Given the need to invest in regional diplomatic frameworks, but also the recent shifts in regional dynamics and greater fragility of the PSC Framework, the Security Council and Secretariat should review whether the mandate, structure and resourcing of the OSE-GL remain fit for purpose, and how they are best structured vis-à-vis the good offices and political engagement capacities of other UN entities and regional organizations.

To those working on future models or mandates of peace operations, including but not limited to the DRC:

- **Strengthen institutional learning on conflict-economy responses**. Although MONUC and MONUSCO undertook a range of initiatives addressing illicit natural resources, awareness of these past efforts and their lessons was often limited, both within the mission and among external partners. Greater efforts should be made to document, disseminate and apply lessons from these initiatives, including through mission transition processes, guidance materials and training, so that future peace operations can build more systematically on previous experiences.
- **Strengthen impact-based performance assessment of peace operations.** Existing performance assessment frameworks, including the Comprehensive Planning and Performance Assessment System (CPAS), should place greater emphasis on assessing the effectiveness and strategic impact of mission activities, rather than primarily measuring outputs or levels of activity. Where missions are mandated to address conflict-financing or other complex political-economy challenges, performance assessments should examine whether interventions contributed to changes in conflict dynamics, governance or armed group financing, alongside more traditional output indicators. It would also complement broader efforts to strengthen institutional learning (such as those suggested in the above recommendation) by generating more meaningful evidence on what approaches are most effective in different operational contexts.
- **Integrate considerations for regional conflict economies in mission planning and design.** Given the increasing importance of regional political economies as drivers of conflict, efforts must be made to consider these issues more systematically in mission planning and design, including:
    - When the Secretariat presents strategic assessments or mission options, it should be expected to explicitly analyse whether regional political economies are sustaining the conflict, and whether peace operations possess comparative advantages that justify operational engagement.
    - Where regional political economies are identified as significant conflict drivers, the Security Council should explicitly prioritize these issues within mission mandates and ensure that missions are provided with the political, analytical and operational capacities needed to address them effectively.
    - Within missions, where regional political economies are identified as strategic conflict drivers, mission leadership could consider establishing mission-wide planning arrangements, task forces or other

collective working group arrangements that bring together political, security, governance and development parts of the mission to design joint strategies.

- **Moving beyond Integrated Strategic Frameworks.** Future discussions on integrated mission models should move beyond coordination mechanisms alone and consider how missions and UN CTs can be organized around genuinely shared strategic priorities when addressing cross-cutting conflict drivers.
- **Ensure that more tailored missions do not result in more limited political capacities.** Proposals to shift to more modular and tailored approaches offer the promise of greater focus and prioritization of key issues, which may improve the degree to which technical, cross-sectoral capacities can be brought together in a more integrated fashion. However, those involved in such proposals should be wary of mission design that strips out more politically oriented mandate elements and capacities; technical approaches alone will not be able to shift the underlying political, governance and security conditions that obstruct progress on such dynamics.
- **Lend greater support to fact-finding and monitoring bodies' efforts to track political-economy dynamics**. The powerful impact that Group of Expert reporting had in energizing both development and peace and security responses around conflict minerals suggests that the Security Council and other multilateral bodies should continue to support independent monitoring and reporting mechanisms on regional conflict economies. Where the Security Council is unable to lend full support for this independent monitoring function, Member States should consider the establishment of independent fact-finding, investigatory or monitoring mechanisms by the General Assembly (alongside other measures), to strengthen the evidence base for collective action.[194]
- **Ensure UN80 discussions consider gaps in regional capacities.** Current discussions under the UN80 initiative should focus not just on cuts but on whether current capacities are fit-for-purpose; specifically, whether the UN possesses sufficient regional political, analytical and coordinating functions to address transnational conflict systems. This includes assessing whether existing regional offices, special envoys and country missions are appropriately mandated and configured to engage cross-border political economies.

For UN and non-UN development actors as well as private sector actors working on responsible sourcing:

- **Pair new investment with investment in responsible sourcing and due diligence frameworks.** As implementation of the Doha Framework, the REIF and related agreements create new opportunities for private sector investment in the mining sector, investors should ensure that comparable attention and resources are devoted to responsible sourcing initiatives, due diligence and conflict-sensitive business practices. Failure to invest in these complementary measures risks reinforcing the very conflict dynamics that threaten long-term stability, increase commercial risk and ultimately undermine the viability of new investments.
- **Expand funding for cross-border development interventions.** Member States and UN entities might consider enabling more funding sources and frameworks designed to operate across borders, including through partnerships with responsible private sector initiatives where appropriate.
- **Expand interventions beyond the mine site.** Development programmes and responsible sourcing initiatives should address the wider supply chains, cross-border trade networks and market incentives that shape mineral production and trade, rather than focusing primarily on mine site conditions.
- **Address barriers and strengthen incentives toward formal trade.** Formalization and responsible sourcing initiatives should focus more on addressing the practical disadvantages of formal markets, working with Governments, financial institutions and commercial buyers to address liquidity and pre-financing constraints, ensure reliable payments and generate more accessible and faster administrative procedures.
- **Design ASM interventions around realistic livelihood transitions.** Programmes should recognize the economic role of artisanal mining and focus on making mining safer, more productive and better governed while expanding complementary livelihood opportunities, rather than assuming rapid exit from the sector.
- **Tailor responsible sourcing strategies to different minerals.** Develop differentiated strategies for distinct commodities, supply chains and local contexts. Strategies that may be effective for 3T minerals should not

automatically be assumed to work for gold, which is more vulnerable to informal trading, cross-border smuggling, and more difficult to trace through formal supply chains.

- **Strengthen community representation in responsible sourcing.** Incorporate community participation, grievance mechanisms and gender-responsive approaches into certification, traceability and responsible sourcing initiatives. These systems are more likely to be effective when local communities perceive tangible benefits and have avenues to raise concerns and resolve disputes.
- **Strengthen opportunities for cross-border community engagement.** Where feasible, incorporate binational community engagement and dialogue mechanisms alongside simplified and enforceable procedures to reduce friction at border points and narrow the space for illicit flows to maneuver.

Annex

This chart tracks the provisions and language related to conflict and natural resource dynamics in DRC-related Security Council resolutions since 2004. A particular focus is on highlighting trends in the mandates related to natural resources for the peace operations operating in DRC. Rather than listing all provisions in chronological order, the chart groups them into key categories of tasking (to MONUSCO or other peace operations) or of other recommendations. For each grouping of tasks, priorities or recommendations, the first row establishes the first use of this language, with subsequent rows providing examples where there are significant changes or additions to that language or provision over time.

MONUSCO tasking related to natural resources		
Common theme	*Security Council resolution(s)*	*Examples of language in provisions*
Curtailing or interdicting support to armed groups (2008–2010, 2016)	S/RES/1856 (2008)	MONUC to "use its monitoring and inspection capacities to curtail the provision of support to illegal armed groups derived from illicit trade in natural resources", as part of disarmament and demobilization (para. 3(j)).
	S/RES/1906 (2009) S/RES/1925 (2010)	Requests MONUC to incorporate into its operations with the FARDC "enhanced efforts to prevent the provision of support to armed groups, including support derived from illicit economic activities and illicit trade in natural resources" (S/RES/1906 (2009), para. 21(d)). See also S/RES/1925 (2010), para. 12(r).
	S/RES/2277 (2016)	MONUSCO encouraged to develop "tailored responses" to armed groups, recognizing the linkage with criminal networks and sectors (para. 31); elsewhere, armed groups' reliance on "illegal exploitation of natural resources" is noted (para. 17), providing support for this to be one of the areas of criminal activity targeted.
Support to validation and traceability initiatives (2009–2012)	S/RES/1906 (2009) S/RES/1925 (2010)	To "prevent the provision of support to armed groups ... derived from illicit trade in natural resources", MONUC (2009)/MONUSCO (2010) were tasked to work jointly with the DRC Government on the "pilot project of bringing together all State services in five trading counters in North and South Kivu in order to improve the traceability of mineral products" (S/RES/1906 (2009), para. 28). See also S/RES/1925 (2010), para. 12(r).
	S/RES/1991 (2011) S/RES/2053 (2012)	MONUSCO to support Congolese authorities in preventing the provision of support to armed groups from illicit natural resource exploitation, including to "carry out spot checks and regular visits to mining sites, trade routes and markets, in the vicinity of the five pilot trading counters" (S/RES/1991 (2011), para. 17). See also S/RES/2053 (2012), para. 25.

Support and technical advice to DRC Government on effective and "equitable" management of natural resources (2013–2024)	S/RES/2098 (2013) S/RES/2147 (2014) S/RES/2211 (2015) S/RES/2277 (2016) S/RES/2348 (2017)	MONUSCO to encourage an "effective national civilian structure to control key mining activities and to manage in an equitable manner the extraction and trade of natural resources in eastern DRC" (S/RES/2098 (2013), para. 14(c)), either as part of good offices (ibid.) or carrying forward stabilization and PSC support (see, e.g. S/RES/2147 (2014), para. 5(f); S/RES/2211 (2015), para. 15(g)), or with mining activities framed as their own priority area (see, e.g. S/RES/2277 (2016) para. 36(iii) and S/RES/2348 (2017), para. 35(iv)).
	S/RES/2463 (2019) S/RES/2502 (2019) S/RES/2556 (2020) S/RES/2612 (2021) S/RES/2666 (2022) S/RES/2717 (2023)	Additional provision tasking MONUSCO to offer "technical assistance" to the Government of DRC in the consolidation of an "effective national civilian structure that controls key mining activities and manages in an equitable manner the extraction, transport, and trade of natural resources in eastern DRC"[195] (S/RES/2463 (2019), para. 29(ii)(d)). Additional language noting that this is in coordination with the Special Envoy to the Great Lake Region's "technical assistance efforts" appears from resolution 2502 through resolution 2717.[196]
	S/RES/2717 (2023)	Expands the provision to include "identifying entry-points for conflict transformation through viable, safe, dignified livelihood options for ex-combatants and their receiving communities" (para. 34 (ii)(k)).
	S/RES/2765 (2024)	Replaces "technical assistance" above with "good offices and technical advice" and adds "with a view to preventing illegal exploitation of natural resources by armed groups and criminal networks supporting them" (para. 36(ii)(n)).
Coordination with regional security forces to stop cross-border flows (2019–2021)	S/RES/2502 (2019) S/RES/2556 (2020) S/RES/2612 (2021)	As a joint priority with MONUSCO, encourages the Government of the DRC to "conduct information-sharing with regional security forces to interdict cross-border flows of arms, combatants, and conflict minerals" (S/RES/2502 (2019), para. 50(d)); S/RES/2556 (2020), para. 54(f). See also S/RES/2612 (2021), para. 54, also referencing this as part of the MONUSCO transition plan.
Information-sharing and coordination with UN entities to stop cross-border flows (2021–2025)	S/RES/2612 (2021) S/RES/2666 (2022) S/RES/2717 (2023) S/RES/2765 (2024) S/RES/2808 (2025)	MONUSCO to work with OSE-GL to "seek political solutions to stop the cross-border flows of armed combatants, arms and natural resources that threaten peace and stability in the DRC, by aligning strategies and conducting information-sharing and coordinating their respective reporting" (S/RES/2612 (2021), para. 26). See also S/RES/2666,(2022), para. 18; S/RES/2717 (2023), para. 17; and S/RES/2765 (2024), para. 19. Slight modification to language in 2025 encouraging "coordinated strategies and information sharing" in addition to "political solutions", and also referencing UNOCA and other UN entities (S/RES/2808 (2025), para. 20).[197]

Recommendations for other actors		
Common theme	*Security Council resolution(s)*	*Examples of language in provisions*
States to take steps through judicial means to end illicit trade (2008–2009)	S/RES/1856 (2008) S/RES/1906 (2009)	Urges all States "to take appropriate steps to end the illicit trade in natural resources, including if necessary through judicial means, and, where necessary, to report to the Security Council" (S/RES/1856 (2008), para. 21). See also S/RES/1906 (2009), para. 28.
DRC Government to demilitarize mining areas (2011–2012)	S/RES/1991 (2011)	Encourages "further demilitarization of the mining areas" as well as the "professionalization and deployment of Congolese Mining Police" (para. 17).
	S/RES/2053 (2012)	Urges "demilitarization of the mining areas", and also "encourages the DRC Government to further increase transparency in the administration of contracts for mining rights and the collection and accounting for taxes" (para. 25).
Demands that armed groups cease exploitation of natural resources (2015–2024)	Annually from S/RES/2211 (2015) through S/RES/2765 (2024)	Demands that all "armed groups cease immediately" destabilising activities, including "the exploitation of natural resources" (S/RES/2211 (2015), para. 23). Provision is repeated annually from resolution 2211 until resolution 2765.[198]
Encourages regional Governments to promote transparent management, and enable regulatory reforms, responsible sourcing and traceability efforts (2019–2025)	S/RES/2463 (2019)	Encourages regional Governments to promote "transparent and lawful management of natural resources, including the adoption of government revenue targets to finance development, sustainable regulatory and customs frameworks, and responsible mineral sourcing supply chain due diligence" (para. 13).
	S/RES/2502 (2019) S/RES/2556 (2020)	Prefaces the above provisions by noting "concern" (subsequently "condemns") "the illegal exploitation and trafficking of natural resources, particularly timber, so-called "conflict minerals" like tin, tantalum, tungsten and gold, as well as diamonds, cobalt, charcoal and wildlife, by armed groups and criminal networks supporting them" (S/RES/2502 (2019), para. 16; S/RES/2556 (2020), para. 16). Subsequent language includes variation on the commodities listed.[199]
	S/RES/2612 (2021) S/RES/2666 (2022) S/RES/2717 (2023)	Expands upon previous provisions to also call for the improvement and reinforcement of the security around mining regions, as well as to seek "rapprochement between mining communities, local authorities and security actors to resolve conflicts and promote the rights of person belonging to communities around mining regions" (S/RES/2612 (2021), para. 16; S/RES/2666 (2022), para. 12; S/RES/2717 (2023), para. 13).
	S/RES/2765 (2024)	Expands upon previous provisions to also include "enhancing judicial cooperation to prosecute cross-border trafficking" (para. 15).
	S/RES/2808 (2025)	Expands upon previous provisions to also stress "the importance of traceability efforts and of managing in an equitable and productive manner the extraction, value addition, transport, and

		trade of natural resources in eastern DRC, with a view to preventing illegal exploitation of natural resources by armed groups and criminal networks supporting them" (para. 16).
Regional organizations to provide political support to counter illegal exploitation of resources (2019–2024)	S/RES/2463 (2019) S/RES/2502 (2019) S/RES/2556 (2020) S/RES/2612 (2021) S/RES/2666 (2022) S/RES/2717 (2023) S/RES/2765 (2024)	"Requests the Secretary-General and calls upon regional organisations to provide political support to the strengthening of State institutions in the DRC …. including through their good offices…" in order to contribute to the "fight against illegal exploitation of natural resources…" (S/RES/2463 (2019), para. 3). Variations of this provision subsequently appear annually.[200]

Key sanctions provisions		
Common theme	*Security Council resolution(s)*	*Examples of language in provisions*
Language recognizing a linkage between arms embargo prohibitions and illegal exploitation of natural resources	S/RES/1533 (2004)	Recognizing a link between the "illegal exploitation of natural resources and trafficking in raw materials and arms" (preamble) and "reaffirms the importance of bringing an end to these illegal activities, including by applying the necessary pressure on the armed groups, traffickers and all other actors involved" (para. 6).
	S/RES/1857 (2008)	"Recognizing the linkage between the illegal exploitation of natural resources, illicit trade in such resources and the proliferation and trafficking of arms as one of the major factors fuelling and exacerbating conflicts in the Great Lakes region of Africa" (preamble).
	S/RES/2198 (2015)	"Reiterating its deep concern regarding the security and humanitarian crisis in eastern DRC due to ongoing military activities of foreign and domestic armed groups and the smuggling of Congolese natural resources" and "Recalling the linkage between the illegal exploitation of natural resources, including poaching and illegal trafficking of wildlife, illicit trade in such resources, and the proliferation and trafficking of arms as one of the major factors fuelling and exacerbating conflicts in the Great Lakes region" (preamble).
Establishing a listing criteria on the basis of support to armed groups via illegal exploitation of natural resources	S/RES/1857 (2008)	Decides that the sanctions measures shall apply to "Individuals or entities supporting the illegal armed groups in the eastern part of the Democratic Republic of the Congo through illicit trade of natural resources" (para. 4(g)).
	S/RES/2198 (2015)	Decides that the sanctions measures shall apply to "supporting individuals or entities, including armed groups, involved in destabilizing activities in the DRC through illicit trade of natural resources, including gold or wildlife as well as wildlife products" (S/RES/2198 (2015), para. 5(g)). See also S/RES/2293 (2016), para. 7(g) and subsequent resolutions.

Recurring preambular language in MONUSCO mandate resolutions		
Common theme	*Security Council resolution(s)*	*Examples of language in provisions*
Illicit trade and exploitation among the major factors fueling conflict in the Great Lakes region	S/RES/1856 (2008) S/RES/1906 (2009) S/RES/1925 (2010)	Recognizing "the link between the illegal exploitation of natural resources" and "the illicit trade in such resources" and arms proliferation and trafficking as among the "major factors fuelling and exacerbating conflicts in the Great Lakes".
	S/RES/1991 (2011)	Calls upon "the African Union and all relevant sub-regional organizations" to support stabilization efforts, notably in the field "combating illicit exploitation and trade of natural resources".
Encouraging ICGLR and regional "fight against illegal exploitation of natural resources"	S/RES/2409 (2018)	"[W]elcomes the decisions of the ICGLR "regarding the fight against illegal exploitation of natural resources in the Great Lakes region" and encourages Member States to "further increase cooperation in fighting illegal exploitation and trade of natural resources, including gold and wildlife".
	S/RES/2463 (2019)	Encourages "the member States of ICGLR and regional economic communities to further increase cooperation in fighting illegal exploitation and trade of natural resources, including through the responsible mineral sourcing supply chain due diligence".
Concern that illegal exploitation and trafficking undermine lasting peace and development (2016-2019)	S/RES/2277 (2016) S/RES/2348 (2017) S/RES/2409 (2018)	Expresses concern regarding "the illegal exploitation and trafficking of natural resources by armed groups, and the negative impact of armed conflict on protected natural areas, which undermines lasting peace and development for the DRC, and encouraging the Government of the DRC to continue efforts to safeguard those areas" (S/RES/2277 (2016)).
	S/RES/2463 (2019)	Adds to the above provision by adding following the phrase "natural resources," "particularly timber, so-called "conflict minerals", particularly gold, as well as charcoal and wildlife".

Endnotes

[1] For references to Rwanda's alleged involvement and support at various stages of M23's advances, see S/2024/432; S/RES/2773 (2025); S/2025/446. On linkages between DRC's minerals and M23 or regional interests, see, for example, Reade Levinson, David Lewis and Sonia Rolley, "Major Rwandan coltan exporter bought smuggled minerals, a UN report says", *Reuters*, 3 July 2025; Sonia Rolley and Felix Njini, "M23 rebels in Goma: gains to boost illicit mineral trade through Rwanda, analysts say", *Reuters*, 28 January 2025.
[2] The XCEPT research programme brings together world-leading experts and local researchers to examine conflict-affected borderlands, how conflicts connect across borders, and the drivers of violent and peaceful behaviour. The programme is funded by UK International Development.
[3] Interview #18, via Microsoft Teams, 9 February 2026.
[4] Already in December 2024, the M23 had occupied substantial territory in North Kivu province, doubling its controlled territory compared to 2020. United Nations, "DR Congo Crisis Live: Security Council hears call for 'urgent and coordinated international action' over Goma", 28 January 2025. For estimates of how such advances contributed to M23 revenue sources and the linkage with export via Rwanda, see S/2024/969, paras. 44, 56–58. See also Carlos Mureithi, "M23 rebels capture strategic mining hub of Walikale in eastern DRC", *The Guardian*, 20 March 2025.
[5] S/2025/446, para. 109.
[6] For references to Rwanda's alleged involvement and support at various stages of M23's advances, see S/2024/432; S/RES/2773 (2025); S/2025/446. On linkages between DRC's minerals and M23 or regional interests, see, for example, Reade Levinson, David Lewis and Sonia Rolley, "Major Rwandan coltan exporter bought smuggled minerals, a UN report says", *Reuters*, 3 July 2025; Sonia Rolley and Felix Njini, "M23 rebels in Goma: gains to boost illicit mineral trade through Rwanda, analysts say", *Reuters*, 28 January 2025.
[7] There have been several different tracks or initiatives within the peace process. While US mediation more directly resulted in the Washington Accord between the DRC and Rwanda, Qatari facilitation contributed to the Washington Accord and has been more prominent in facilitating negotiations between the M23 and the DRC Government. The African Union has also played a role in other outstanding issues, and triangulating these accords with other regional arrangements.
[8] Democratic Republic of the Congo and Republic of Rwanda, Regional Economic Integration Framework between the Government of the Democratic Republic of the Congo and the Government of the Republic of Rwanda, Washington, D.C., 4 December 2025. Available at https://www.peaceagreements.org/media/documents/CD_RW_251204_Regional_Economic_Integration_Framework.pdf. Between the DRC and the United States there were two linked bilateral agreements: a Strategic Partnership Agreement, and a Memorandum of Understanding on Expanded Security Partnership. Both are available publicly and prominently and include issues of access to and development of mineral wealth and natural resources. There is also a US-Rwanda Framework for Shared Economic Prosperity, which has not been made public, but reporting on it also suggests some degree of emphasis on regional economic issues, including those related to natural resources exploitation and export. Strategic Partnership between the United States of America and Democratic Republic of the Congo, signed at Washington, D. C. on 4 December 2025. See Andrew Mills, "US pushes Congo, Rwanda for peace accord accompanied by mineral deals", *Reuters*, 1 May 2025; Daphne Psaledakis, Sonia Rolley and Ange Adihe Kasongo, "Rwanda, Congo sign peace deal in US to end fighting, attract investment", *Reuters*, 27 June 2025; Saleh Mwanamilongo, "Opposition Grows in Congo over US mineral Deal", *Associated Press*, 10 February 2026.
[9] Jason Stearns, *North Kivu: The Background to Conflict in North Kivu Province of Eastern Congo* (London, Rift Valley Institute, 2012); Enough Project Team, "A Comprehensive Approach to Congo's Conflict Minerals", Center for American Progress Strategy Paper (Washington, D.C., 2009); Judith Verweijen, *Stable Instability: Political Settlements and Armed Groups in the Congo* (London, Rift Valley Institute, 2016).
[10] S/RES/1323 (2000), preamble.
[11] Both are known from their French acronyms. The English translation of the acronym is United Nations Organization Mission in the Democratic Republic of the Congo for MONUC, and United Nations Organization Stabilization Mission in the Democratic Republic of the Congo for MONUSCO.
[12] While many have argued that UN peace operations should be more aware of and responsive to political-economy dynamics, responding to such dynamics has not even been robustly integrated in most mission tools and functions. See Mats Berdal and Jake Sherman, eds., *The Political Economy of Civil War and UN Peace Operations* (Routledge, 2023).
[13] Interview #25, New York, 6 February 2026.
[14] Building on the Brahimi Report's call in 2000 for better integrated planning and support for UN peace operations, the UN adopted the Integrated Mission Planning Process (IMPP) in 2006 as the first formal framework for integrated missions across the UN system. A/55/305–S/2000/809, paras. 198–199; United Nations, *Integrated Missions Planning Process (IMPP): Guidelines endorsed by the Secretary-General* (2006).
[15] The Cross-Border Conflict Evidence, Policy and Trends (XCEPT) research programme brings together world-leading experts and local researchers to examine conflict-affected borderlands, how conflicts connect across borders, and the drivers of violent and peaceful behaviour. The programme is funded by UK International Development.
[16] For more on "modular" approaches and how they fit into ongoing deliberations about the future models of peace operations, see El-Ghassim Wane, Paul D. Williams and Ai Kihara-Hunt, *The Future of Peacekeeping, New Models, and Related Capabilities* (New York, United Nations Department of Peace Operations, 2024); Eugene Chen, "What do we mean by modular approaches to UN peace operations?" *Blue Helmets, Red Tape blog*, 9 October 2025.
[17] For maps illustrating the major cobalt and copper mines in these southern border areas, see International Crisis Group, "Mineral Concessions: Avoiding Conflict in DR Congo's Mining Heartland", Africa Report No. 29 (New York, 2020), pp. 26–28. Zanna Buckland, "'Largest-ever' lithium exploration campaign launched in the DRC", Institute of Materials, Minerals and Mining, 16 April 2026. Available at https://www.iom3.org/resource/lithium-exploration-launched-in-drc.html.
[18] Governance challenges in this region tend to revolve around contract transparency, the participation of State-owned enterprises, revenue-sharing and regulatory oversight. Cobalt Institute, "Responsible Sourcing", 2026; International Peace Information Service (IPIS), "Carte de l'exploitation minière artisanale dans l'Est de la RD Congo", 19 March 2018; Dirk-Jan Koch and Sara Kinsbergen, "Exaggerating unintended effects? Competing narratives on the impact of conflict minerals regulation", *Resources Policy*, vol. 57 (2018); Kaisa Toroskainen, Alexander Malden and Jean Pierre Okenda, *DRC's mining revenues: Increasing accountability by analyzing payments to governments reports* (Natural Resource Governance Institute, 2020), pp. 20–23; Interview #24, New York, 6 February 2026.
[19] S/PV.10114. For charts illustrating the relative global rankings of these minerals, in terms of their amounts, see International Crisis Group, "Mineral Concessions: Avoiding Conflict in DR Congo's Mining Heartland", Africa Report No. 29 (New York, 2020), pp. 26–28.
[20] Interview #24.
[21] On the complex relationship and power dynamics between elites in Kinshasa and eastern DRC generally, see Judith Verweijen, *Stable Instability: Political Settlements and Armed Groups in the Congo* (London, Rift Valley Institute, 2016).
[22] See generally Séverine Autesserre, "D.R. Congo: Explaining Peace Building Failures, 2003 – 2006", *Review of African Political Economy*, vol. 113, No. 34 (2007), pp. 426–427; Enough Project Team, "A Comprehensive Approach to Congo's Conflict Minerals"; Daan van Uhm, Milou Tjoonk and Eliode Bakole, *Business as Usual: Illegal Charcoal and Timber Trade in Eastern DRC* (Geneva, Global Initiative Against Transnational Organized Crime, 2022); Grace Harris, Ebonie Kibalya

and Lea Gruber, "Special Report: Conflict Minerals in the DR Congo", *Genocide Watch*, 9 June 2025; Interview #26, with DRC mineral expert, by MS Teams, 25 March 2026.
[23] Jan Leysen and others, *Analysis of the interactive map of artisanal mining areas in eastern Democratic Republic of Congo* (2023 update) (IPIS, 2023); World Bank, *Achieving sustainable and inclusive Artisanal and Small-Scale Mining (ASM): A renewed framework for World Bank engagement* (Washington, D.C., World Bank, 2024).
[24] Lusaka Ceasefire Agreement (S/1999/815, annex). MONUC was established in late 1999 to support implementation of the agreement. S/RES/1279 (1999), paras. 4-5.
[25] See for example, S/2001/357 (2001), paras. 4, 7, 109.
[26] S/2001/357 (2001), paras. 32–70, 125–172. Subsequent reports documented exploitation networks involving the Rwanda-aligned Rassemblement congolais pour la démocratie-Goma and the Uganda-aligned Mouvement de libération du Congo, as well as the Rassemblement congolais pour la démocratie–Mouvement de liberation, a splinter faction operating in eastern DRC, and Ituri-based factions. See S/2002/1146, paras. 19-21, 100–101.
[27] S/2001/357 (2001), paras. 126–142, 212; S/2002/1146, paras. 12–21.
[28] S/2002/1146, para. 12.
[29] S/2015/19, paras. 190–194; S/2016/466, para. 115; S/2017/672, paras. 99–101.
[30] United States Department of State, "Statement of Concern Related to Certain Minerals Supply Chains from Rwanda and Eastern Democratic Republic of the Congo Contributing to the Ongoing Conflict", 8 July 2024; Stearns, "All that Glitters: The struggle over Congolese gold"; Moses H. Gahigi, "Rwanda braces for billions as Washington deal goes live", *Zawya*, 8 December 2025.
[31] Organisation for Economic Co-operation and Development (OECD), "Illicit flows of gold concentrates in the maritime space", OECD Policy Brief (Paris, OECD, 2025).
[32] Interview #26, with DRC mineral expert, by Microsoft Teams, 25 March 2026.
[33] Resolution 1493 established an arms embargo for the DRC. S/RES/1493 (2003). Resolution 1533 established the 1533 Sanctions Committee and the Group of Experts to support it. S/RES/1533 (2004).
[34] S/2016/1102, para. 57.
[35] S/2016/466, para. 115; Other studies have identified higher levels of armed interference in gold extraction than, for example, in 3T minerals extraction. Leysen and others, *Analysis of the interactive map of artisanal mining areas in eastern Democratic Republic of Congo*, pp. 14–18.
[36] Michelle Nichols, "Exclusive: Rwanda exercises command and control over M23 rebels, say UN experts", *Reuters*, 2 July 2025.
[37] Jan Leysen and others, *Analysis of the interactive map of artisanal mining areas in eastern Democratic Republic of Congo*, pp. 6–7, 33.
[38] Jeroen Cuvelier and Timothy Raeymaekers, *Supporting the War Economy in the DRC: European Companies and the Coltan Trade* (Antwerp, IPIS, 2014); Jason K. Stearns, *The War That Doesn't Say Its Name: The Unending Conflict in the Congo* (Princeton, New Jersey, Princeton University Press, 2021).
[39] In some cases, land grants or mineral concession rights have been granted to Rwandaphones in DRC, sometimes in connection with regional tensions and efforts to address armed group tensions and incentives. These grants have then contested (sometimes via armed force and militia mobilization) by other segments of the community. The collective result is an overall clouded legal title, as well as a history of contestation of these land grant titles via armed violence. Interview #26, via Microsoft Teams, 25 March 2026; Interview #25b, New York, 17 July 2026; Interview #33, via Whatsapp, 22 May 2026.
[40] Lassane Kone, *Democratic Republic of the Congo: A rights-based analysis of mining legislation* (Moreton-in-Marsh, Forest Peoples Programme, 2023). See also PAX, "Addressing conflict and engaging meaningfully with artisanal miners in Kibali's concession in the DRC", 8 December 2025.
[41] See International Crisis Group, "Mineral Concessions: Avoiding Conflict in DR Congo's Mining Heartland", Africa Report No. 29 (New York, 2020); Jason Stearns, "All that glitters: The struggle over Congolese gold", Congo Research Group, 15 May 2023.
[42] S/2024/969, paras. 36, 44, 56–57, 62, 66. Based on Group of Experts reporting the Security Council Committee has explicitly called for alignment of supply chains for minerals originating from Rubaya with due-diligence guidelines. United Nations, "Group of Experts Makes Recommendation regarding Minerals Originating from Rubaya, North Kivu", press release, 3 January 2024.
[43] S/PV.10114.
[44] S/2025/446, paras. 109–113; Monika Pronczuk, "UN experts say Rwanda supported rebels in Congo and smuggled minerals at 'unprecedented levels'", *Associated Press*, 4 July 2025.
[45] The Panel was first requested in 2000 by a Security Council presidential statement. S/PRST/2000/20.
[46] See, for example, S/2008/773 , paras. 6, 72–73, 130; S/2010/252, paras. 16, 63-65, 70; S/2010/596, paras. 173, 180–181, 186–187.
[47] United States of America, Dodd-Frank Wall Street Reform and Consumer Protection Act, Pub. L. 111-203, §1502 (Conflict Minerals), 21 July 2010. Available at https://www.congress.gov/111/plaws/publ203/PLAW-111publ203.pdf.
[48] S/2010/596, chapter IX. These guidelines followed a request from the Security Council in 2009. S/RES/1896 (2009), para. 7.
[49] S/RES/1952 (2010), paras. 8, 9.
[50] The third edition of the OECD Guidance, published in 2016, is the current industry standard.
[51] An IPIS article from 2013 offers a helpful snapshot of the variety and type of actors engaged in responses to conflict minerals through a table in the Appendix. Ken Matthysen and Jeroen Cuvelier, *Conflict Minerals' Initiatives in DR Congo: Perceptions of Local Mining Communities* (Antwerp, IPIS, 2013), pp. 51–52. See also Nicolas Eslava, *Successful implementation of conflict mineral certification and due diligence schemes and the European Union's role: lessons learned for responsible mineral supply* (Strategic Dialogue on Sustainable Raw Materials for Europe, 2018). Available at https://www.stradeproject.eu/fileadmin/user_upload/pdf/STRADE_Report_D4.19_Due_Diligence_Certification.pdf.
[52] Many of the initiatives discussed in this section, and expert interviews that informed the analysis, were outside of the UN system – such as bilaterally supported development initiatives, those of international financial institutions (such as the World Bank) or those led by the private sector. These initiatives vary in the extent to which they were designed specifically to address conflict minerals, versus more oriented around sustainable development and livelihood outcomes. For example, one of the main private sector traceability initiatives introduced below was designed to enable a 'conflict-free' mineral supply chain coming out of eastern DRC; the main regional regulatory mechanism discussed was designed as part of broader regional peace and security objectives and commitments. By contrast, the aims of many of the alternative livelihood interventions are more in alignment with classic economic development goals, albeit with significant awareness of armed group dynamics.
[53] ITSCi, *Theory of Change* (London, 2023). Available at https://www.itsci.org/wp-content/uploads/2023/02/ITSCI-theory-of-change_final_Feb-2023.pdf.
[54] OECD and UN, "Conflict transformation and the role of responsible artisanal and small-scale mining"; IMPACT, *The Just Gold Project: Lessons for the Future of Artisanal Gold in Democratic Republic of Congo* (Ottawa, 2021). Levin Sources, "Market Analysis: ASM Gold".
[55] OECD, *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*, 3rd ed. (Paris, OECD Publishing, 2016); International Conference on the Great Lakes Region (ICGLR), *Regional Certification Mechanism (RCM) Certification Manual* (Bujumbura, ICGLR Secretariat, 2011); ITSCI, *Theory of Change*.
[56] Estelle Levin, *Mineral Certification Schemes in the African Great Lakes Region: A Comparative Analysis* (London, Estelle Levin Ltd. for GTZ and the International Conference on the Great Lakes Region, 2010); Ken Matthysen and Steven Spittaels, *The Formalisation of Artisanal Mining in the Democratic Republic of the Congo and Rwanda* (Antwerp, IPIS and Center for International Forestry Research, 2012).

[57] ICGLR, *Manual of the Regional Certification Mechanism (RCM) of the International Conference of the Great Lakes Region (ICGLR)*, 2nd edition (ICGLR, 2019), p. 19.
[58] Mike Loch and Adam Rolfe, “An Introduction to 'Blue Status' for Mine Sites and Exporters”, Responsible Mineral Trade, LLC, 21 September 2020. Available at https://responsibletradellc.com/index.php/rcm-blog-series-introducing-the-second-edition-of-the-regional-certification-mechanism/.
[59] Estelle Levin, *Mineral Certification Schemes in the African Great Lakes Region: A Comparative Analysis* (Bujumbura, ICGLR, 2010). Available at https://www.levinsources.com/assets/pages/report-giz-icglr-mineral-certification-schemes-great-lakes-region-glr.pdf. Among other components of the RCM system, there was an envisaged regional database to share and reconcile production and trade data, and flag inconsistencies or gaps. The framework for this database was created, but sufficient funding was not provided to maintain it, and ICGLR Member States only provided the data needed to populate it sporadically or in limited amounts. Interview #26.
[60] S/RES/1291 (2000); S/RES/1304 (2000).
[61] Fiona Irakoze, “The Six tools of the ICGLR’s Regional Initiative against Illegal exploitation as key allies in boosting mineral trust in the Great Lakes Region”, paper presented at International Conference on the Great Lakes Region, 28 November 2024.
[62] Estelle Levin, *Mineral Certification Schemes in the African Great Lakes Region*; ICGLR, *Manual of the Regional Certification Mechanism (RCM) of the International Conference on the Great Lakes Region* (ICGLR); United Nations Economic Commission for Africa (UNECA), *Special Report on the ICGLR Regional Initiative against the Illegal Exploitation of Natural Resources (RINR)* (Addis Ababa, UNECA, 2013).
[63] For discussion of comparable programming in other parts of sub-Saharan Africa going back to the 1980s and 1990s, see: Gavin Hilson and James McQuilken, “Four decades of support for artisanal and small-scale mining in sub-Saharan Africa: A critical review”, *The Extractive Industries and Society*, vol.1, No. 1 (2014).
[64] The World Bank PROMINES programme, for example, supported the creation of Zones d’Exploitation Artisanale (ZEAs), which were efforts to formalize artisanal mining and training and institutional support for government mining authorities. For more information see https://documents1.worldbank.org/curated/en/872481557158663580/pdf/Democratic-Republic-of-Congo-Growth-with-Governance-in-the-Mineral-Sector-Project.pdf.
[65] World Bank, “DRC-Growth with Governance in the Mineral Sector”, Implementation Completion and Results Report (Washington, D.C., 2019); World Bank, “Democratic Republic of Congo – Growth with Governance in the Mining Sector (PROMINES)”, Implementation Status and Results Report (Washington, D.C., 2013); IPIS, *Mapping Artisanal Mining Areas and Mineral Supply Chains in Eastern DR Congo* (2019); IMPACT, *Just Gold Project: Lessons Learned from Six Years of Implementing Responsible Artisanal Gold Supply Chains in the Democratic Republic of the Congo* (2021); IMPACT, *Operationalizing the OECD Due Diligence Guidance: The Just Gold Pilot in the Democratic Republic of the Congo* (2016); The Borgen Project, “USAID’s Economic Support In The Congo”, n. d. Available at https://borgenproject.org/support-in-the-congo/#:~:text=USAID's%20Responsible%20Minerals%20Trade%20(RMT,their%20taxes%20to%20the%20government.
[66] International Alert, “Madini: Minéraux pour la paix et le développement en RDC”, 2024. Available at https://www.international-alert.org/fr/madini-kwa-amani-na-maendeleo-mineraux-pour-la-paix-et-le-developpement/; Levin Sources, “Market Analysis: ASM Gold”, pp. 21–28. Interview #6, via Microsoft Teams, 9 January 2026; Interview #7, via Microsoft Teams, 9 January 2026.
[67] World Bank, *Democratic Republic of Congo: Growth with Governance in the Mining Sector*; Jan Leysen and others, *Analysis of the Interactive Map of Artisanal Mining Areas*; Levin Sources, “Market Analysis: ASM Gold”.
[68] These have been shown to improve gender and civilian protection outcomes, demonstrate tangible benefits of participation in formalization and certification processes, and reduce the risk of extortion or gender-based violence (which otherwise might deter these groups from participating in formal systems). Rose Bashwira Nyenyezi and Michaël Bahigira Akilimali, *Increasing awareness of policy reforms on gender equality issues in artisanal and small-scale mining in eastern DRC: Case study of the Numbi, Nzibira and Nyabibwe sites* (Antwerp, IPIS, 2023); International Alert, “Madini: Minéraux pour la paix et le développement en RDC”, 2024. Available at https://www.international-alert.org/fr/madini-kwa-amani-na-maendeleo-mineraux-pour-la-paix-et-le-developpement/.
[69] International Alert, "Madini kwa Amani na Maendeleo: Minéraux pour la paix et le développement”, n. d. On gender-related programming (including concerns of insufficient gender consideration), see Marie-Rose Bashwira Nyenyezi and Michaël Bahigira Akilimali, *Increasing awareness of policy reforms on gender equality issues in artisanal and small-scale mining in eastern DRC: Case study of the Numbi, Nzibira and Nyabibwe sites* (Antwerp, IPIS, 2023); Karen Hayes and others, “Women in the Artisanal and Small-Scale Mining Sector of the Democratic Republic of the Congo”, in *High-Value Natural Resources and Post Conflict Peacebuilding*, P. Lujala and S.A. Rustad, eds. (London, Earthscan, 2010); Mélanie Gouby, “Rise of the ‘Mother Boss’: How Female Miners Are Taking Control in DRC”.
[70] Decision Support Unit (DSU), *Summary Report: Artisanal and Small-Scale Mining-Agriculture Linkages. Final Field Fieldwork Report* (2019); World Bank, *Achieving Sustainable and Inclusive ASM: A Renewed Framework for World Bank Engagement* (2024).
[71] Interview #18, with former MONUSCO staff, via Microsoft Teams, 9 February 2026.
[72] PRG and others, *Evaluating Due Diligence Programs for Conflict Min*erals; S/2022/479 (2022), paras. 75–80, 147–149, 202 (c)–(d).
[73] Interview #11, via Microsoft Teams, January 15, 2026.
[74] Estelle Levin, *Mineral Certification Schemes in the African Great Lakes Region*; Global Communities, *USAID’s Zahabu Safi (Clean Gold) Project: Final Report* (December 17, 2018–December 16, 2023) (2024).
[75] PRG and others, *Evaluating Due Diligence Programs for Conflict Minerals*.
[76] An example of this “de-risking effect” was the USAID-supported Zahabu Safi (Clean Gold) project, which established a Refiners’ Community of Practice and broader downstream engagement with refiners and jewelry companies to facilitate responsible sourcing relationships for ASM gold from eastern DRC. The project culminated in several letters of intent and at least one documented purchase agreement by a participating refiner, illustrating how traceability and due diligence mechanisms can help generate downstream commercial confidence in licit supply chains. See Global Communities, *USAID’s Zahabu Safi (Clean Gold) Project: Final Report*, pp. 8–12; LBMA, *Responsible Gold Guidance*, version 9 (London, 2021).
[77] Estelle Levin, *Mineral Certification Schemes in the African Great Lakes Region*; PRG and others, *Evaluating Due Diligence Programs for Conflict Minerals*.
[78] Mike Loch and Adam Rolfe, “An Introduction to 'Blue Status' for Mine Sites and Exporters”. Interview #8, via Microsoft Teams, 12 January 2026. Interview #6, via Microsoft Teams, 9 January 2026; Interview #18, via Microsoft Teams, 9 February 2026.
[79] ICGLR, *Overview of the RINR* (2020). Available at https://icglr.org/wp-content/uploads/2020/07/Overview-of-the-SIx-Tools-of-the-RINR_Final.pdf; IMPACT, “Update Enhancing the Reliability of the ICGLR Regional Certification Method”, 2025. Available at https://impacttransform.org/en/peace-and-security-in-the-great-lakes-region-2024-updates/#:~:text=As%20part%20of%20this%20process,the%20first%20quarter%20of%202025.
[80] Levin Sources, “Market Analysis: ASM Gold”, p. 32.
[81] IPIS and Ulula, *Assessing the impact of due diligence programmes in eastern DRC: A baseline study* (Antwerp and Toronto, 2019); Project on Resources and Governance (PRG), IPIS, Sub-Saharan Field Research and Consulting Services (SFR) and Ulula, *Evaluating Due Diligence Programs for Conflict Minerals: A Matched Analysis of 3T Mines in Eastern DRC* (Los Angeles and Antwerp, 2020); C. Vogel, J. Musamba and B. Radley, “A miner’s canary in eastern Congo: Formalisation of artisanal 3T mining and precarious livelihoods in South Kivu”, *The Extractive Industries and Society*, vol. 5, No. 3 (2018), pp. 384–392.; Interview #4, via Microsoft Teams, December 30, 2025; Sarah Way, “Integrating artisanal mining into the formal economy would benefit African miners and economies alike”, Atlantic Council, 12 July 2024.
[82] PRG and others, *Evaluating Due Diligence Programs for Conflict Minerals*; Marie-Rose Bashwira Nyenyezi and Michaël Bahigira Akilimali, *Increasing awareness of policy reforms on gender equality issues in artisanal and small-scale mining in eastern DRC: Case study of the Numbi, Nzibira and Nyabibwe sites* (Antwerp,

IPIS, 2023). Observers have noted high lack of gender parity and consideration in this programming overall. Mélanie Gouby, “Rise of the ‘Mother Boss’: How Female Miners Are Taking Control in DRC”, *The Guardian*, 19 January 2024.
[83] Interview #26, via Microsoft Teams, 25 March 2026
[84] This is slightly less of an issue for 3T mines compared to gold, because 3T operations tend to already be more established, so they are easier to formalize, and they have an easier time securing pre-financing than small ASM gold miners. Interview #26.
[85] For further discussion of the potential role and importance of such measures, see Rachel Brass, “USAID’s Zahabu Safi (Clean Gold) Project Launches Refiners Community of Practice to Help Set Up Responsible Gold Supply Chain from Eastern DRC”, Global Communities, 27 May 2022; Levin Sources, “Market Analysis: ASM Gold”; Global Communities, *USAID’s Zahabu Safi (Clean Gold) Project: Final Report*, pp. 13–15; World Bank, *State of the Artisanal and Small-Scale Mining Sector* (Washington, D.C., 2019); World Bank, “DRC-Growth with Governance in the Mineral Sector”.
[86] Interview #6, via Microsoft Teams, 9 January 2026.
[87] Southern Africa Resource Watch (SARW), *The High Cost of Congolese Gold: Poverty, Abuse and the Collapse of Family and Community Structures* (SARW, 2019), p. 3; Interview #5, via Microsoft Teams, 7 January 2026; Interview #6, via Microsoft Teams, 9 January 2026.
[88] IMPACT, *Enabling Community Resilience: Annual Report 2024–2025* (2025); Beth J. Maclin and others, “Moving to the mines: Motivations of men and women for migration to artisanal and small-scale mining sites in Eastern Democratic Republic of the Congo”, *Resources Policy*, vol. 51 (2017), pp. 115–122; Rachel Perks, “How can public-private partnerships contribute to security and human rights policy and practice in the extractive industries”, *Resources Policy*, vol. 37, No. 2 (June 2012), pp. 251–260.
[89] Global Witness, “The iTSCi Laundromat: How a due diligence scheme appears to launder conflict minerals”, *Global Witness Investigation report* (London, Global Witness, 2022); S/2021/560, Annex 49.
[90] Global Witness, “The ITSCI Laundromat”.
[91] For example, Congolese military authorities in Bukavu have publicly exposed high-level smuggling rings – involving provincial intelligence and immigration officials – moving gold to Rwanda, illustrating clear gaps on both sides of the border in terms of enforcement. Jason Stearns, “All that glitters: The struggle over Congolese gold”. See also United States Department of State, “Statement of Concern Related to Certain Minerals Supply Chains from Rwanda and Eastern Democratic Republic of the Congo Contributing to the Ongoing Conflict”, Washington, D.C., 9 July 2024.
[92] Global Witness, “The ITSCI Laundromat”; Moses Kulaba and Roger Vutsoro, “Critical Minerals Certification: Do Mineral Certification Mechanisms Reduce Harm? A Look at the Kimberley Process, ICGLR, RMI and OECD”, Governance and Economic Policy Centre, June 2025. Despite clear evidence that Rwandan exports do not match with domestic production, this regular pattern of evasion has not disrupted some of these supply chains as being certified “clean”, which Global Witness pointed to as a failure of the iTSCi traceability scheme, but which also points to deficits in the RCM and other regional traceability initiatives. Ibid.
[93] Interview #26, with DRC mineral expert, via Microsoft Teams, 25 March 2026.
[94] PRG and others, *Evaluating Due Diligence Programs for Conflict Minerals*.
[95] S/RES/1533 (2004), para. 10.
[96] S/RES/1533 (2004), preamble. The resolution also encouraged all States to “take appropriate” action on alleged arms flows highlighted in the reports of the Panel of Experts on the Illegal Exploitation of Natural Resources. Ibid., para. 8(b).
[97] S/RES/1857 (2008), para. 4(g).
[98] S/RES/2198 (2015), para. 5 (g); S/RES/2293 (2016), para. 7(g).
[99] MONUC was first mandated to support monitoring and enforcement of the UN arms embargo with S/RES/1493 (2003), paras. 19–20. This element of the mission’s mandate was continued through the transition to MONUSCO with S/RES/1925 (2010), para. 12(t); and has been continued since, i.e., via S/RES/2147 (2014), para. 4(c); S/RES/2277 (2016), para. 43; S/RES/2666 (2022), para. 34.
[100] See, for example, S/2014/42; S/2015/19; S/2017/672/Rev.1.
[101] United Nations Security Council, “Security Council Democratic Republic of Congo Sanctions Committee Updates Sanctions List”, press release, 6 February 2015.
[102] United Nations Security Council, Security Council Committee established pursuant to resolution 1533 (2004) concerning the Democratic Republic of the Congo, “Sanctions List Materials: Narrative Summaries of Reasons for Listing: Guidon Shimiray Mwissa” (last accessed 23 December 2025).
[103] United Nations, "Security Council 1533 Sanctions Committee Adds Six Entries to Its List of Individuals and Entities Subject to Assets Freeze, Travel Ban," press release, 20 February 2024. In June 2023, prior to Yakutumba’s sanctioning, the Group of Experts on the DRC reported on the activities of the Mai-Mai Yakutumba group and had identified Yaukutumba as controlling most of the goldmining activities in the Fizi territory. S/2023/431 (2023), Annex 73.
[104] Council of the European Union, “Democratic Republic of the Congo: EU renews restrictive measures and adds eight additional individuals”, press release, 8 December 2022. There is no stand-alone “natural resources exploitation” listing criterion within the UK sanctions authorities for the DRC; Goetz’s designation cites his involvement in the global gold market and illicit gold trade as contributing to the key bases for listing criteria: serious human rights violations, supporting armed conflict, or undermining governance (those derived from the 1533 regime). Government of the UK, Office of Financial Sanctions Implementation and HM Treasury, “Consolidated List of Financial Sanctions Targets in the UK. Regime: Democratic Republic of the Congo”, last Updated 15 August 2025. Available at https://www.gov.uk/government/publications/financial-sanctions-democratic-republic-of-the-congo.
[105] Permanent Representative of the Democratic Republic of the Congo to the United Nations, letter to the President of the Security Council, 10 February 2025. S/2025/87.
[106] S/RES/2773 (2025). On discussions leading up to this, including consideration for the question of sanctions on Rwanda, see United Nations Security Council, “Briefing on the worsening situation in the Democratic Republic of the Congo”, press release, 26 January 2025; United Nations Security Council, “Democratic Republic of Congo Battling Worsening Humanitarian Crisis, Armed Conflict, Despite Recent Peaceful Elections, Special Representative Tells Security Council”, press release, 27 March 2024.
[107] Council Implementing Decision (CFSP) 2025/510 (2025), listing Nine Individuals and One Entity in Connection with the Illicit Exploitation of Natural Resources in the Democratic Republic of the Congo; CFSP 2022/2412 (2022), amending the European Union Autonomous Sanctions Framework for the Democratic Republic of the Congo. The European Union had expanded its autonomous DRC sanctions authorities (those distinct from the UN 1533 sanctions regime) in 2022 to include those who contribute to conflict or insecurity through the illicit exploitation or trade of natural resources. Council of the European Union, CFSP 2025/510 of 17 March 2025 implementing Decision 2010/788/CFSP concerning restrictive measures in view of the situation in the Democratic Republic of the Congo, Official Journal of the European Union, L series, 2025/510, 17 March 2025; Council of the European Union, Council Decision (CFSP) 2022/2412 of 8 December 2022 amending Decision 2010/788/CFSP concerning restrictive measures in view of the situation in the Democratic Republic of the Congo, Official Journal of the European Union, L 317/122, 9 December 2022.
[108] Tammy Bruce, United States Department of State Spokesperson, “Sanctioning Critical Minerals Traffickers Stoking Armed Conflict in the Eastern Democratic Republic of the Congo”, press statement, 12 August 2025. The sanctions targeted (1) the Coalition of Congolese Patriotic Resistance–Force de Frappe, an armed group active in North Kivu; (2) the Cooperative des Artisanaux Miniers du Congo; and (3–4) two Hong Kong–based mineral trading firms, East Rise Corporation Limited and Star Dragon Corporation Limited, designated by the United States Treasury for facilitating the export of illicitly sourced coltan and other critical minerals from militia-controlled mining areas.
[109] United Nations Security Council, Committee established pursuant to resolution 1533 (2004) concerning the Democratic Republic of the Congo, Sanctions List, entry for Alliance Fleuve Congo (AFC) (CDe.010), listed on 14 July 2026; S/RES/2293 (2016), para. 7(g).

[110] United Nations Security Council, Committee established pursuant to resolution 1533 (2004) concerning the Democratic Republic of the Congo, Sanctions List, entry for John Imani Nzenze (CDi.049), listed on 14 July 2026.
[111] S/RES/1533 (2004), preamble. The resolution also encouraged all States to "take appropriate" action on alleged arms flows highlighted in the reports of the Panel of Experts on the Illegal Exploitation of Natural Resources. Ibid., para. 8(b).
[112] As part of the mission's Disarmament, Demobilization, Rehabilitation and Reintegration functions, MONUC was to "Use its monitoring and inspection capacities to curtail the provision of support to illegal armed groups derived from illicit trade in natural resources". S/RES/1856 (2008), para. 3(j). In 2009, the Security Council requested that MONUC incorporate into its operations with the FARDC "enhanced efforts to prevent the provision of support to armed groups, including support derived from illicit economic activities and illicit trade in natural resources". S/RES/1906 (2009), para. 21(d)).
[113] S/RES/1925 (2010), para. 12(r).
[114] DDRRR is an acronym used by MONUSCO to encompass both the disarmament, demobilization and reintegration (DDR) of Congolese ex-combatants, as well as the repatriation of foreign combatants. MONUSCO, "DDR/RR", 15 July 2025. Available at: https://monusco.unmissions.org/en/ddrrr.
[115] For example, from 2013 to 2015, the language in the MONUSCO mandate encouraging technical support to the DRC Government to enable "effective national civilian structure to control key mining activities" (or similar language in subsequent years) was situated under the missions' stabilization activities. S/RES/2147 (2014); S/RES/2211 (2015), para. 12(c). But from 2016 to 2022, this same or similar mandate language is introduced in a section generally aligned toward stabilization and supporting governance and State authority. It is not directly framed as a stabilization task, but as its own category. See, for example, S/RES/2277 (2016), para. 35 (iii); S/RES/2463(2019).
[116] S/RES/2717 (2023), para 34 (ii)(k).
[117] S/RES/2717 (2023), para 34 (ii)(k).
[118] On MONUSCO's central role in coordinating "between the Government of the DRC, international partners and United Nations agencies" on the implementation of the International Security and Stabilisation Support Strategy (ISSSS)", see for example: S/RES/2348 (2017), para. 35(i)(a); S/RES/2409 (2018), para. 37(i)(a); S/RES/2463 (2019), para. 29(ii)(b); S/RES/2502 (2019), para. 29(ii)(a); S/RES/2556 (2020), para. 29(ii)(a); S/RES/2612 (2021), para. 29(ii)(a). See also MONUSCO, "Stabilization Strategy (ISSSS)", 27 February 2018. Interview #18, via Microsoft Teams, 9 February 2026. Interview #19, via Microsoft Teams, 10 February 2026.
[119] MONUSCO, "Stabilization Strategy (ISSSS)"; Interview #19, via Microsoft Teams, 10 February 2026.
[120] S/RES/2277 (2016), para. 31.On the crime-conflict nexus and efforts to mainstream responses to it within UN operations, see Louise Bosetti, James Cockayne and John de Boer, *Crime-Proofing Conflict Prevention, Management and Peacebuilding: A Review of Emerging Good Practice* (New York, UNU-CPR, 2016).
[121] Interview #27, with former MONUSCO staff, via Whatsapp, 24 March 2026.
[122] The Group of Experts' reporting does not generally portray M23 as being in control of mine sites in this period but benefiting more from the capture of other cross-border trade revenues and taxation. S/2012/843.
[123] See, for example, S/2012/843; S/2014/42. Particularly following the period of the M23 crisis, a prominent issue was that other armed groups – such as local Mai-Mai groups or other armed actors – were pushed out of controlling key mining areas and supplanted by the FARDC. See S/2014/42. On FARDC engagement and control of mines generally, see also OECD, *Mineral Supply Chain and Conflict Links in the Eastern Democratic Republic of the Congo: Five Years of Implementing Supply Chain Due Diligence* (Paris, OECD Publishing, 2015). On armed group control patterns in this period and case studies, see generally, Ken Matthysen and Jeroen Cuvelier, *Conflict Minerals' Initiatives in DR Congo: Perceptions of Local Mining Communities*.
[124] S/RES/2098 (2013), para. 12(b).
[125] Interview #18, via Microsoft Teams, 9 February 2026. Overall, the impact of these operations on armed group involvement in natural resource exploitation was uneven. In some areas, efforts to disrupt armed groups were undermined by collusion between elements of the FARDC and armed actors involved in mining and mineral trading.
[126] Interview #18, via Microsoft Teams, 9 February 2026.
[127] S/RES/1925 (2010), para. 12(r).
[128] Interview #18 with former MONUSCO staff, via Microsoft Teams, 9 February 2026. See also Ken Matthysen and Jeroen Cuvelier, *Conflict Minerals Initiatives in DR Congo*, pp. 11–12.
[129] Ken Matthysen and Jeroen Cuvelier, *Conflict Minerals Initiatives in DR Congo*, pp. 11–12.
[130] For descriptions of some of these activities see S/2010/512, para. 51; S/2011/20, para. 54; S/2011/298, para. 51; S/2011/656, para. 53; S/2012/355, paras. 51–52.
[131] S/RES/1991 (2011), para. 17; S/2012/838, para. 75; S/RES/2053 (2012), para. 25.
[132] S/2013/96, para. 57; S/2014/698, para. 67. IPIS, *Mineral Supply Chains and Conflict Links in Eastern Democratic Republic of the Congo* (Paris, OECD, 2015), pp. 36–37.
[133] S/2013/96, para. 57. See also S/2014/157, paras. 66–67.
[134] S/2013/96, para. 57.
[135] Ken Matthysen and Jeroen Cuvelier, *Conflict Minerals Initiatives in DR Congo*, pp. 11, 39.
[136] Interview #18, via Microsoft Teams, 9 February 2026.
[137] Ibid.
[138] Secretary-General reporting during this time describes MONUSCO engagement in mine site validation, which it described (in part) as determining "if mines are directly or indirectly controlled by armed groups and if basic human rights standards are respected". S/2013/96, para. 58.
[139] S/2014/956, para. 58.
[140] See S/2013/96, para. 58; S/2013/581, paras. 64, 65; S/2013/757, para. 72; S/2014/157, paras. 66–67; S/2014/450, para. 65.
[141] S/2013/96, para. 58. This information was also supported in some of the broader interviews with those present at the time.
[142] The shift is evident in changes in the structure and detail of Secretary-General reporting (from specific sections on MONUSCO's engagement in extraction and natural resources issues in 2013 and 2014 to only overall references to minerals issues from 2015 reporting), as well as through interview source descriptions of common activities. See S/2015/1031; S/2015/173. This also parallels shifts in the mandate, with specific reference to mine site validating and traceability exercises going away and replaced with more indirect references to government support, reporting, and advising from 2013, and then even more sharply from 2016 onward.
[143] Interview #28, New York, 9 April 2026. The language introduced first in 2013 that MONUSCO should provide technical assistance to the Government of the DRC on supporting a civilian mining infrastructure aimed at managing "in an equitable manner the extraction, transport, and trade of natural resources in eastern DRC" recurred almost verbatim through 2022. See, S/RES/2098 (2013), para. 14(c); S/RES/2147 (2014), para. 5(c); S/RES/2463 (2019), para. 29(d); S/RES/2666 (2022), para. 24(j).
[144] For example, in 2021, in a subsection focused on addressing root causes of conflict as part of MONUSCO's "exit strategy", the Security Council mandated MONUSCO to "conduct information-sharing with security forces in the region to interdict cross-border flows of arms, combatants, and natural resources". S/RES/2612 (2021), para. 54(d). There is similar language in the mandates from 2019 and 2020, albeit linked to joint efforts with the Special Envoy's office or other actors. See S/RES/2556 (2020), para. 14; S/RES/2463(2019), para. 27.
[145] S/RES/2765 (2024), para. 19. See similar language in prior mandates: S/RES/2666 (2022), para. 18; S/RES/2717 (2023), para. 17.
[146] This position was supported by the German Government, seconded from Germany's Federal Institute for Geosciences and Natural Resources.
[147] Nonetheless, one INGO interlocutor noted that MONUSCO, via the Mission's natural resources expert, was able to provide analysis and information that her organization lacked. She also noted a time in which her organization had gathered information on mining issues, and she privately shared this information with

her counterparts in MONUSCO and the Group of Experts so they could take it forward. Still, she remarked that this degree of information sharing could have been more systematic and less dependent on individual relationships, but she did not share how the information might have been used. Interview #19, via Microsoft Teams, 10 February 2026.
[148] Interview #25, New York, 6 February 2026. One example given surrounded armed group interference at the Rubaya site, which at one point was the source for one-third of global coltan production.
[149] See Executive Office of the Secretary-General, *Policy on Integrated Assessment and Planning* (New York, United Nations, 2023).
[150] With regard to natural resources, the Country Assistance Framework, which was applicable from 2007 to 2010, noted illegal exploitation during conflict, including the involvement of warring parties and cross-border smuggling, but addressed these issues primarily through a governance lens, focusing on transparency initiatives, revenue management and institutional capacity-building. See *Country Assistance Framework for the Democratic Republic of the Congo* (United Nations, 2007), pp. 16–18, 45–47, 88–90. Available at: https://www.oecd.org/content/dam/oecd/en/toolkits/derec/evaluation-reports/derec/unitedkingdom/40696261.pdf.
[151] Nations Unies RD Congo. *Cadre de coopération pour le développement durable (CCDD) 2025–2029* [United Nations Sustainable Development Cooperation Framework (UNSDCF) 2025–2029] (2025), pp. 48-52.
[152] Interview #17 with IOM officials, New York, 2 February 2026; Interview #18 with a former MONUSCO staff member, via MS Teams, 9 February 2026.
[153] Interview #14 with a former UNDP staff member, via Microsoft Teams, 21 January 2026; Interview #18 with a former MONUSCO staff member, via MS Teams, 9 February 2026.
[154] Interview #15, via Microsoft Teams, 19 January 2026.
[155] Interview #31, New York, 12 May 2026. Yet the same interlocutor observed a limitation – that MONUSCO tends to only construct the main roads (often justified based on its own logistical needs or PoC response demands), whereas what would be required to truly address market access issues was greater work on secondary access roads.
[156] Interview #19, via Microsoft Teams, 10 February 2026.
[157] Interview #8, via Microsoft Teams, 12 January 2026. Interview #10, via Microsoft Teams, 14 January 2026.
[158] For example, in 2013 the SRSG of MONUSCO was mandated to use good offices to: "Encourage the prompt establishment and the consolidation of an effective national civilian structure to control key mining activities and to manage in an equitable manner the extraction and trade of natural resources" in eastern DRC. S/RES/2098 (2013), para. 14(c). See Annex for full listing of these provisions.
[159] The OSE-GL has been listed as a special political mission in UN planning and budget documents since the time of its creation. See, for example, A/70/7/Add.11. Unlike some special political missions, it does not have a significant field presence but has had roughly 20 to 30 staff members assigned to it at any given time, operating out of the headquarters in Nairobi.
[160] S/RES/2098 (2013), para. 4.
[161] Interview #29, via Microsoft Teams, 21 April 2026; Interview #28, New York, 9 April 2026.
[162] Since 2020, the OSE-GL has also coordinated implementation of the UN Strategy for Peace Consolidation, Conflict Prevention and Conflict Resolution in the Great Lakes Region, which includes a pillar dedicated to the sustainable and transparent management of natural resources. S/2020/1168, p. 21. The Special Envoy's office helps coordinate the involvement of more than 50 UN entities and agencies that are active in the region in support of this Strategy and has supported programming under the second pillar. For example, in 2021, OSE-GL co-organized a High-Level Regional Workshop on Natural Resources in the Region with ICGLR and GIZ, bringing together Great Lakes States, private sector actors, civil society and partners of the region to discuss priority actions toward implementing the RCM. This culminated in 30 recommendations which OSE-GL then helped ICGLR translate into a roadmap for implementation. S/2020/1168. Inferences on the technical assistance and shuttle diplomacy were derived from interview sources. Interview #22, via Microsoft Teams, 17 February 2026.
[163] For evidence of the larger conflict dynamics being raised at meetings of heads of State within the ICGLR, see, for example, Agence Congolaise de Presse, "DRC victim of unjustified aggression by another ICGLR member country (Prime Minister)", 14 November 2025.
[164] S/2013/96, para. 57. See also S/2014/157, paras. 66–67. IPIS, *Mineral Supply Chains and Conflict Links in Eastern Democratic Republic of the Congo* (Paris, OECD, 2015), pp. 36–37.
[165] As an example of lack of government capacity, a reason given for the failure of one initiative to monitor the illegal trafficking of minerals (part of the traceability and trading centres scheme) was "owing to a lack of resources and capacity of the Commission nationale de lutte contre la fraude minière". S/2013/96, para. 58. On lack of political will, the Group of Expert monitoring of some of these mine site validation and traceability initiatives from 2011 on paints an overall pattern of failure on the Government's part to implement traceability measures (for example failing to tag supplies, misusing tags, or other issues in implementation), as well as multiple examples of FARDC officers in control of and benefiting from illegal exploitation at certain lines, or involved in smuggling routes. See, for example, S/2015/19; S/2017/672/Rev.1.
[166] Interview #18, via Microsoft Teams, 9 February 2026.
[167] Interview #59 with former MONUSCO personnel, via Whatsapp, 22 May 2026.
[168] Deliberate efforts were made to improve integration, including through the ISF, which was intended to align mission and UN CT priorities and provide a structure for joint planning and coordination. Victor Angelo, *Inter-mission Cooperation: Reflecting on Sudan and Central Africa Experiences* (Oslo, Norwegian Institute of International Affairs, 2011), p. 36. The DRC mission was one of the earliest to experiment with these ISFs. However, a 2016 Office of Internal Oversight Services evaluation found MONUSCO and the UN CT to be among the least integrated of the mission settings examined, with the ISF viewed as largely unimplemented and ineffective. *Evaluation of the Integration Between Peacekeeping Operations and the United Nations Country Teams in Haiti, Côte d'Ivoire and the Democratic Republic of the Congo* (United Nations publication, 2016), p. 3, para. 72.
[169] Interview #25b, New York, 17 July 2026.
[170] Jaïr van der Lijn, "Fit for Purpose: Effective Peace Operations Partnerships in an Era of Non-Traditional Security Challenges", SIPRI Final Report of the New Geopolitics of Peace Operations III Initiative (Stockholm, 2024), p. 41.
[171] Interview #18, via Microsoft Teams, 9 February 2026.
[172] Interview #9, via Microsoft Teams, 12 January 2026.
[173] Interview #25, New York, 6 February 2026. See also Interview #18, via Microsoft Teams, 9 February 2026.
[174] Interview #25, New York, 6 February 2026; Interview #28, New York, 9 April 2026.
[175] Interview #59, via Whatsapp, 22 May 2026.
[176] Several observations suggest that the creation of the Special Envoy's office was interpreted by some as re-assigning the natural resources element of MONUSCO's mandate to the Special Envoy's office, which might be seen as undercutting MONUSCO's good offices, rather than supplementing it. Indeed, an interlocutor from the Special Envoy's office said they did not consider MONUSCO to have a natural resources mandate. Interview #22, via Microsoft Teams, 17 February 2026. Another former MONUSCO staff member offered the view that the creation of the Special Envoy's office created the impression that responding to the regional natural resources challenges, in particular the development and investment-oriented aspects, was now more in the lane of the OSE-GL. Interview #25, New York, 6 February 2026.
[177] Interview #27, via Whatsapp, 24 March 2026.
[178] Interview #27, via Whatsapp, 24 March 2026. Referencing OSE-GL's mandate being rooted in the PSC Framework, another interlocutor noted, "if you want an office to remain relevant, don't tie it to an agreement". Interview #24, New York, 22 April 2026.

[179] Interview #29, via Microsoft Teams, 21 April 2026; Interview #28, New York, 9 April 2026.
[180] Interview #59, via Whatsapp, 22 May 2026.
[181] Interview #32, Entebbe, Uganda, 19 November 2025.
[182] Ibid.
[183] Ken Matthysen and Jeroen Cuvelier, *Conflict Minerals Initiatives in DR Congo*, pp. 8.
[184] One illustration of this can be seen in one of the few cross-border programming initiatives supported through the Peacebuilding Fund cross-border funding modality, a project titled "DRC-Rwanda Creating peace dividends for women and youth through increased cross-border trade and strengthened food security (DRC)", which aimed to address food and economic insecurity among cross-border communities, and was implemented jointly by UNDP, the UN's Food and Agriculture Organization and the World Food Programme, both in Rwanda and DRC. Although jointly designed and overseen by the two Resident Coordinators, with a joint Steering Committee and Technical Committee spanning both countries, implementation largely continued through separate country offices, national partners and nationally managed workplans. Much of the resulting programming therefore remained parallel rather than genuinely transnational. Further information on this project is available at https://mptf.undp.org/project/00122834. For similar observations of parallel rather than truly transnational programming in PBF-supported cross-border projects, see Erica Gaston and others, *Climate-Security and Peacebuilding: Thematic Review* (New York, United Nations University, 2023).
[185] United States Department of State, "Joint Statement Between the Representatives of the Government of the Democratic Republic of the Congo and the Representatives of the Alliance Fleuve Congo/March 23 Movement (AFC/M23) on the Doha Process", 22 August 2026; Reuters, "Ceasefire monitors deploy in eastern Congo under Qatari peace deal", 24 August 2026. The EJVM+ builds on the ICGLR's Expanded Joint Verification Mechanism, originally developed after the 2012–2013 M23 crisis to monitor cross-border security incidents and allegations of support to armed groups. Under the Doha Framework, it has been identified as part of the monitoring and verification architecture for the current ceasefire and related commitments. Democratic Republic of the Congo and AFC/M23, "Joint Statement on Progress Between the Representatives of Government of the Democratic Republic of the Congo and of the Alliance Fleuve Congo/March 23 Movement (AFC/M23)", Montreux, Switzerland, 18 April 2026; African Union, "Joint Statement on the Sixth Joint Oversight Committee for the Peace Agreement Between the Democratic Republic of the Congo and the Republic of Rwanda", London, 25 June 2026.
[186] S/2002/1146, para. 12.
[187] S/2024/969, paras. 36, 44, 56–57, 62, 66. S/2025/446, paras. 109–113; United Nations, "Group of Experts Makes Recommendation regarding Minerals Originating from Rubaya, North Kivu", press release, 3 January 2024; Monika Pronczuk, "UN experts say Rwanda supported rebels in Congo and smuggled minerals at 'unprecedented levels'", *Associated Press*, 4 July 2025. Although Rwanda rejects these allegations, both analysts and other Member States have highlighted the widening gap between Rwanda's limited domestic gold production and its rapidly growing official gold exports as a strong indicator that gold originating in eastern DRC continues to enter regional and international markets. United States Department of State, "Statement of Concern Related to Certain Minerals Supply Chains from Rwanda and Eastern Democratic Republic of the Congo Contributing to the Ongoing Conflict", 8 July 2024; Stearns, "All that Glitters: The struggle over Congolese gold"; Moses H. Gahigi, "Rwanda braces for billions as Washington deal goes live", *Zawya*, 8 December 2025.
[188] Democratic Republic of the Congo and Republic of Rwanda, Regional Economic Integration Framework between the Government of the Democratic Republic of the Congo and the Government of the Republic of Rwanda, Washington, D.C., 4 December 2025, Statement of Tenets; sec. II.C ("Mineral Supply Chains").
[189] IPIS documented repeated efforts by armed actors to advance on the Rubaya mining area during intense fighting in February 2026, followed by renewed clashes around the same strategic corridor in early May despite ongoing diplomatic negotiations. IPIS, *Shifting Frontlines in 2026: New Year, Old Challenges – Hostilities in Eastern DRC Continue amid Increased Diplomatic Efforts* (Antwerp, IPIS, 2026). Notably, many of these clashes erupted shortly after the Rubaya site was listed by the Government of DRC as part of the Strategic Asset Reserves it claimed under the US-DRC Strategic Partnership. Oivia Kumwenda-Mtambo, "US companies eye Congo mining assets, including Rubaya, State Dept official says", *Reuters*, 20 April 2026.
[190] Congo Research Group, *Can a Peace Deal Be Made in Doha? Options for the Government of the Democratic Republic of Congo and the M23* (New York, Center on International Cooperation, New York University, October 2025).
[191] S/RES/2773 (2025). See also United Nations Security Council, "Briefing on the worsening situation in the Democratic Republic of the Congo", press release, 26 January 2025; United Nations Security Council, "Democratic Republic of Congo Battling Worsening Humanitarian Crisis, Armed Conflict, Despite Recent Peaceful Elections, Special Representative Tells Security Council", press release, 27 March 2024.
[192] Security Council Report, "Natural Resources", July 2026 Monthly Forecast: Natural Resources, 1 July 2026; United Nations, "Security Council Holds High-Level Open Debate on Natural Resource Governance as Foundation of Peace", Security and Prosperity, press release SC/16419, 14 July 2026.
[193] See Group of Experts on the Democratic Republic of the Congo, S/2025/858, paras. 89–92.
[194] Erica Gaston and Adam Day, *Assembly for Peace: A Digital Handbook on the UN General Assembly's Past Practice on Peace and Security* (New York, Office of the President of the General Assembly, 2024).
[195] From resolution 2717 onward, this phrase is modified to reference "the extraction, value addition, transport, and trade of natural resources in eastern DRC" (emphasis added). S/RES/2717 (2023), para. 34 (ii)(k); S/RES/2765 (2024), para. 36(ii)(n)).
[196] See S/RES/2502 (2019), para. 29(ii)(b)); S/RES/2556 (2020), para. 29(ii)(b); S/RES/2612 (2021), para. 29(ii)(b); S/RES/2666 (2022), para. 24(ii)(j); S/RES/2717 (2023), para. 34 (ii)(k).
[197] Language on "coordinated strategies and shared information" between MONUSCO, UNOCA and other UN entities appeared in previous resolutions, but not always in connection with natural resources in previous variants. See, for example, S/RES/2666 (2022), para. 18.
[198] See also S/RES/2277 (2016), para. 17; S/RES/2348 (2017), para. 15; S/RES/2409 (2018), para. 20; S/RES/2463 (2019), para. 11; S/RES/2502 (2019), para. 13; S/RES/2556 (2020), para. 13; S/RES/2612 (2021), para. 13; S/RES/2666 (2022), para. 10; S/RES/2717 (2023), para. 10; S/RES/2765 (2024) para. 10.
[199] In addition, in subsequent resolutions, the language tended to "condemn" rather than noting concern over continued illegal exploitation. See also S/RES/2612 (2021), para. 16; S/RES/2666 (2022), para. 12; S/RES/2717 (2023), para. 13; and S/RES/2808 (2025), para. 16.
[200] See S/RES/2502 (2019), para. 16.; S/RES/2556 (2020), para. 3; S/RES/2612 (2021), para. 3; S/RES/2666 (2022), para. 3; S/RES/2717 (2023), para. 3; S/RES/2765 (2024), para. 3.

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