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When citing please refer to the published article, located here:
<http://dx.doi.org/10.1016/j.exis.2015.05.005>

Fighting Windmills in Eastern Congo? The Ambiguous Impact of the ‘Conflict Minerals’ Movement

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Abstract

The artisanal and small-scale mining (ASM) sector in the Eastern Democratic Republic of the Congo (DRC) is currently undergoing rapid reform of its governance structure as a result of multiple national, regional and international policies and initiatives designed to sever the direct link between minerals and conflict in the region. We briefly review the theoretical context behind and major policies outcomes of this reform process, and offer an initial assessment of its operationalization. We conclude that the ‘conflict minerals’ approach is at a critical juncture, caught between the need to deliver a reliable and viable response and the reality of delivering new modes of disarticulation and dispossession. To contribute to the former scenario, recommendations for the focus of future scholarship are provided.

Keywords: artisanal and small-scale mining, conflict minerals, resource governance, Democratic Republic of the Congo, ITRI

1. Introduction¹

The artisanal and small-scale mining (ASM) sector in the Eastern Democratic Republic of the Congo (DRC) is currently undergoing rapid reform of its governance structure as a result of multiple national, regional and international policies and initiatives designed to sever the direct link between minerals and conflict in the region. These interventions enter into a complex cohabitation in a landscape marked by legal pluralism and multiple conflict dynamics that have shaped the region’s subsequent wars since 1996 (Vlassenroot and Raeymaekers, 2004; Stearns, 2010).

The ASM sector is one of the most important forms of employment in the Eastern DRC, with approximately 800,000 miners (D’sousa, 2007) and an estimated eight to 10 million people across the country directly or indirectly dependent on its activities for their livelihood (see for instance World Bank, 2008, Pact, 2010). Hence, the impact of this change on local communities and the

¹ The authors would like to dedicate this commentary piece to the memory of Reverend Didier de Failly who passed away in June 2015. This article is partly based on an op-ed for the Washington Post at <http://www.washingtonpost.com/blogs/monkey-cage/wp/2014/09/10/in-eastern-congo-economic-colonialism-in-the-guise-of-ethical-consumption/>. For their equal share of commitment and research, both authors should be considered as first authors of this article. Ben Radley is a PhD candidate at the International Institute of Social Studies at The Hague (radley@iss.nl), Christoph Vogel is a PhD candidate at the Political Geography Unit at University of Zurich (chvogel@geo.uzh.ch).

developmental trajectory of the region has been and will continue to be profound.² In the remainder of this article, we briefly review the theoretical context behind and major policy outcomes of the current reform process, before offering an initial assessment of its operationalization, drawing on empirical evidence and observations from qualitative fieldwork conducted by both authors in North and South Kivu Provinces of the Eastern DRC between 2012 and 2015.³

2. Context

In an earlier issue of this journal, fellow researchers argued that over the past two decades “*growing concerns about the role of natural resources in conflict have [...] encouraged policymakers to design new frameworks of intervention, aimed at cutting the supposed links between armed groups and resources and at promoting transparent models of resource governance*” (Cuvelier et al., 2014a: p. 341). In the DRC, these ‘growing concerns’ can be traced back to 2001, when a UN Panel of Experts on the Illegal Exploitation of Natural Resources in the DRC submitted its first report to the Security Council, recommending an immediate embargo on the trade in minerals from the Eastern DRC due to their systematic exploitation by armed groups as a means to finance their activities (United Nations Security Council, 2001).

However, “*these interventions often tend to rely on unsupported assumptions regarding how natural resources are linked to the motivations of combatants and the dynamics of conflict, and rarely consider the populations in conflict-affected regions, who play an integral role in these dynamics*” (Cuvelier et al., 2014a: p. 341). The Eastern DRC is no exception, and the inadequacy of these assumptions in providing causal explanations for conflict in the region (and appropriate solutions) have been well documented elsewhere (Geenen and Radley, 2014; Stearns, 2014; Cuvelier et al., 2014a; Johnson, 2013; Cuvelier et al., 2013; Korf, 2006; Nathan, 2005): “*A number of studies have highlighted the fact that NRM [Natural Resource Management] interventions by themselves cannot be effective conflict-resolution tools unless they are integrated and aligned with SSR [Security Sector Reform] initiatives*” (Garrett and Piccinni, 2012: p. 7). Nevertheless, the mono-dimensional struggle against so-called ‘conflict minerals’ has become an integral part of the DRC’s dominant narrative today, spanning policies and practical engagement in the sector (Autesserre, 2012) and reproducing quasi-‘Orientalist’ mind-sets that imagine Congolese as either barbaric and greedy or disenfranchised and helpless (see Said, 1979 for similar discursive constructions).

Arguably the most significant policy outcome of this narrative to date, Section 1502 of the Dodd–Frank Act, was passed by American Congress and signed into law by President Obama in July 2010. It requires companies registered on the US stock market to report on an annual basis whether their minerals have been sourced from the Eastern DRC or neighboring countries, and if so, whether or not they are financing conflict. More recently, on 5 March 2014, the European Union introduced a voluntary conflict minerals regulation scheme for all member states, and the UN and OECD have developed due diligence guidelines on sourcing natural resources in high-risk areas such as the Eastern DRC (Spittaels et al., 2014). In February 2012, the Congolese Government ratified the OECD guidelines into national law.

² See, for example, Seay (2012) who drew an estimate from Congolese civil society organizations that up to two million people were directly or indirectly affected by ‘conflict minerals’ policies (the presidential mining ban, followed by the enactment of Dodd–Frank Section 1502, in 2010).

³ Ben Radley has carried out fieldwork in North and South Kivu in February– October 2012, February–March 2013, June–July 2013, November–December 2013, and August 2014; Christoph Vogel in January–May 2013, January–February 2014, May–August 2014, and January–February 2015.

This recent momentum at the level of policy has had a significant impact on the ground, where the problem has been understood as a technical matter requiring a technical solution (due to the ahistorical and apolitical analysis of underlying theories), to be found in the certification and formalisation of the Eastern DRC's entire mineral production and trade process (Geenen, 2012). Crucially, practical initiatives developed in response to the policy assume that state weakness in the Eastern DRC is associated with the absence of governance, contrary to increasing recognition of processes of negotiation of authority and governance between state and non-state actors (Radley and Rothenberg, 2014; Hagmann and Péclard, 2011; Raeymaekers et al., 2008). In such configurations, multiple political cultures and regulatory logics compete and coexist against (but ultimately dependent upon) the idea of Western statehood, a phenomenon referred to by De Sousa Santos as the 'heterogeneous state' (Raeymaekers, 2009: p. 579). Thus, the imposition of 'neutral' technical solutions onto an assumed 'terra nullius' has, rather than solving the problems it seeks to address, led to new forms of struggle, subversion, and cooptation as part of the region's "*constant mediation between global capitalism and local forms of governance*" (Raeymaekers, 2009: p. 583).

3. General effects and problems

More than four years after the signing of the Dodd–Frank Act, only a small fraction of the hundreds of mine sites in the Eastern DRC have been reached by the practical measures required to conform to Dodd–Frank legislation, OECD guidelines, and regional policies, such as supply chain traceability or mineral export certification.

In the Kivu provinces, as of 2014 only four areas (Nyabibwe, Rubaya, Lemera, and Nzibira)⁴ have been introduced into traceability schemes through iTSCi, the bagging-and-tagging system put in place by the International Tin Research Institute (ITRI) – the body of the international tin industry⁵ – allowing for legal trade in tin, tantalum, and tungsten (3T) minerals. While they include around 40 mining sites, the overwhelming majority (over 900 sites in South Kivu alone) continue to await traceability or certification systems that would allow them to regain legal access to global markets.⁶

As a result, a large part of the local mining economy remains beyond the pale, forced into either illegality or collapse as certain international buyers have responded to the legislation by going 'Congo-free'.⁷ This situation has in turn sustained a de facto embargo on mineral trade in the Kivu region,⁸ negatively affecting the vast majority of Congolese mining communities. Large numbers of Congolese miners and those indirectly dependent on mining revenue (such as restaurant owners and local market sellers) lost their jobs or businesses or had their incomes

⁴ The respective provincial governments plan to launch traceability for 10–20 other mining sites in late 2014 and early 2015. In Maniema and Katanga provinces, a certain number of sites have been introduced to traceability, as well as in Rwanda and Burundi.

⁵ See https://www.itri.co.uk/index.php?option=com_zoo&view=frontpage&Itemid=60.

⁶ In an inversion of the legal principle of 'in-dubio-pro-reo', Section 1502 of the Dodd–Frank Act has judged all mine sites 'guilty' until proven 'innocent', regardless or not of whether they are or have recently been controlled by or financing armed groups. Mining in Maniema Province, for example, is known to have been free from armed group interference for several years.

⁷ See Obama's Law interview with Matthias Wachter at <http://www.obamaslaw.com/the-experts/matthias-wachter/>.

⁸ According to official government export statistics for South Kivu, for example, the value of cassiterite exports fell from 37,227,138 USD in 2009 to 9,218,850 USD in 2011. During the same time period, the value of coltan exports dropped from 2,646,333 USD to 233,916 USD. The impact was likely more severe for unofficial exports, which make up the majority of mineral trade in the region.

significantly reduced, with some (re-) joining armed groups as a way to earn a living in the absence of alternative employment opportunities.⁹

At the same time a recent United Nations Group of Experts report found that the region's black market in minerals has been strengthened (United Nations Security Council, 2014), playing into the hands of the very mafia and rebel networks the movement is intended to starve of mineral revenue in the first place while enforcing lower mineral prices on miners who have no-one else left to sell to. According to an observer, "*that is the major, principle conclusion, the principle consequence of Dodd–Frank is that it boosted smuggling, absolutely*".¹⁰ An increased number of related arrests by Congolese authorities in mid-2014 confirm this increased smuggling, indicating an even higher amount of undetected cases (United Nations Security Council, 2015). Violence and the presence of armed groups, however, have not significantly decreased during the embargo and since the inception of traceability and certification schemes (Spittaels et al., 2014).¹¹

Indeed, our own recent fieldwork as well as academic research by others in Eastern Congo has shown that while only a comparatively small number of mine sites is de facto controlled by armed actors, all players involved in the mineral supply chain remain at risk of being captured – that is, taken over – by enduring and self-reproducing networks of fraud and violent exploitation that want to retain a chance of selling their minerals (Cuvelier et al., 2014b). These unintended consequences starkly contrast with the findings of influential advocacy groups such as Global Witness (2013) who deny the existence of a de facto embargo¹² or the Enough Project's assertions that anti-'conflict minerals' legislation and initiatives have had a significant positive impact on the ground (Bafilemba et al., 2014).

4. International Tin Research Institute

In three of North and South Kivu's four 'clean areas' where traceability schemes allowing for legal trade have been introduced by iTSCi at the end of 2014, prices have stagnated or decreased compared with pre-Dodd–Frank levels,¹³ related in part to the loss of market competitiveness experienced as the iTSCi system creates new costs and bureaucratic requirements.¹⁴ Although ITRI generally maintains a limited presence in the sites – its senior and audit staff only periodically visit and local employees appear to spend most of their time in their offices as opposed to at the mining sites – it deeply impacts the local economy. As has been documented elsewhere, the rise of neoliberal discourses of transparency, accountability, and good governance and the concomitant bureaucratic demands can multiply rather than diminish opportunities for corruption and fraud (Tidey, 2013, Welker, 2014: p. 118). In response to ITRI's requirements, institutions change,

⁹ Several independent sources interviewed in Shabunda made a link between the de facto embargo and the strengthening of armed groups in the region, and in particular the Raia Mutomboki. One unit of the Raia Mutomboki was also interviewed, among whom several members confirmed that they had left the mining sector for the armed group following the events of 2010 and 2011.

¹⁰ From an interview with an artisanal mining expert in South Kivu, conducted in February 2013.

¹¹ See also a sequential mapping of armed groups and their approximate zones of influence in North and South Kivu since October 2013 at <https://www.christophvogel.net/mapping>.

¹² See <https://www.globalwitness.org/en/library/myth-buster-con%EF%AC%82ict-mineralsprovision/>.

¹³ For example in Kalimbi, the first pilot project site for iTSCi's tagging-and-bagging scheme, miners reported that cassiterite was selling at 8-11 USD per kilo before 2010, whereas today it has dropped to 4-6USD per kilo. All other iTSCi areas in North Kivu and South Kivu show a similar trend: while only one area experienced relative price stability, prices have been falling. The reasons are multi-faceted but monopsony features across the otherwise more site-specific factors. During the same time period, the price of tin has risen by more than 15% on the global market, only significantly falling again since late 2014. (see <http://www.infomine.com/investment/metal-prices/tin/5-year/>).

¹⁴ Cf. interviews carried out by the authors.

creating a new source of revenue for both state and non-state actors involved in myriad additional, semiformal taxation systems that go mostly unregulated and uncontrolled on the ground.¹⁵

Traceability and iTSCi's closed pipeline scheme has also triggered a buyer-end regulation of the market at various levels of the supply chain, with local producers beholden to monopsonies at the exportation and, ultimately, the smelter level. From its position of monopsony, ITRI levies high fees from its local partners and has been accused by traders and mining officials of lobbying against competitors entering the 'traceability market' and establishing alternative systems. As a result the choice local producers face is to sell at the artificially reduced price or to go 'illegal' in bypassing the iTSCi scheme (Cuvelier et al., 2014b). While mining cooperatives and traders do not always purposely aim at undermining the traceability scheme, its setup has, in some areas, created a regulatory environment where the shadow economy becomes a necessary alternative for economic subsistence. A second problematic consequence is increasing tension between traders (négociants) and miners (creuseurs). While trickery and dissatisfaction have always been part of the economic negotiations and transactions between these actors, the monopsony pressure has an exacerbating influence, creating new conflicts rather than taming old ones.

More worryingly still, the same industry proposing to seek a clean market for Congolese minerals appears to be largely disinterested in local realities, including the minerals' actual 'cleanliness', as long as the market continues to function. ITRI's implementing partner NGO Pact tries to correct this but seems overburdened with effectively counter-balancing the powerfully projected premises of market expansion and the concomitant opening and closure processes of capitalist frontiers.¹⁶ For example, for understandable economic reasons the scheme tends to develop in larger and more accessible mining sites (Spittaels et al., 2014), yet the continued presence of armed actors in and around these areas has not resulted in ITRI halting their scheme nor prevented ITRI from including new sites on the basis of return rather than sustainability. Moreover, almost no corporate stakeholder – despite their well-publicized corporate social responsibility policies¹⁷ – has visibly engaged in Eastern Congo to help Congolese actors comply with regulations, improve labor security, or increase decent livelihoods. Most conflict minerals advocates have yet to address these shortcomings.¹⁸

Furthermore, and notwithstanding the costs and challenges it burdens onto local producers, ITRI's bagging-and-tagging scheme is yet to develop a secure and solid mechanism to prevent untagged minerals from entering the circuit. Coupled with persisting presence of armed actors in certain iTSCi sites, this means their supply chain may not always fully adhere to OECD and UN due diligence standards.¹⁹ Several interviewees also confirmed that 'conflict-free' tags are sometimes recycled and subsequently used for several bags.

Instead, the industry-led traceability scheme currently functions more as an artificial price-control mechanism: the levy ITRI demands for each ton of tin is subtracted down the supply chain

¹⁵ The traceability process has created a new layer of bureaucracy. For instance, with tagging hours neatly regulated, state agents have developed a new unofficial tax called 'late charging fee', when minerals are registered after 6PM. Another example is the establishment of a new tax called informal 'registration sheet' in one iTSCi site, which has been put in the place by mining officials to respond to shrinking revenue due to the evolving monopsony. In other sites, non-statutory authorities have taken traceability as an occasion to create new taxes.

¹⁶ Cf. interviews carried out by the authors.

¹⁷ See, for example, Intel at <http://www.intel.com/content/www/us/en/policy/policy-con%EF%AC%82ict-minerals.html>.

¹⁸ It is interesting to recall here the history of Section 1502 of the Dodd–Frank Act, which began in 2009 as a stand-alone Conflict Minerals Act. This original bill contained supportive measures to address such issues. However, it was rejected by Congress and its supportive measures were dropped as it was later tacked on in a reduced format as a miscellaneous section to the Dodd–Frank Wall Street Reform and Consumer Protection Act.

¹⁹ See the respective OECD due diligence guideline at <http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf> and the UN due diligence guideline at http://www.un.org/sc/committee/1533/pdf/due_diligence_guidelines.pdf.

from the official selling price (which corresponds to the London Metal Exchange in the case of tin and to bilaterally negotiated prices for the non-listed tantalum). The current net effect is that many Congolese miners must – in the absence of market alternatives – pay the international tin industry for the right to sell their minerals with a tag that implies, but does not necessarily achieve, ‘conflict-free’ status.

More generally, it remains unclear to what extent the Congolese mining industry is impacted in terms of production and exportation. Statistics published by ITRI seem to provide only a partial assessment of the DRC’s 3T mineral production levels. Documents suggest that, for a time, ITRI refused to share its data with the Congolese government.²⁰ This surprisingly secretive practice runs counter to attempts to increase transparency and accountability in the artisanal mining sector, whose initial producers, the miners, remain the most marginalised when it comes to access to information.

5. Mine site validations

Finally, the fluidity of armed movements in the Kivus makes the validation of ‘clean sites’ both difficult and unreliable over time. With militias (or their civilian-clothed friends and family) present in and around the mines (for example running roadblocks to extort taxes), the veracity of the ‘conflict-free’ designation is questionable, particularly given the delay between when a mine site is visited, validated, included into a traceability scheme, and later audited, the whole process taking months, if not years in certain cases. Such delays are further complicated by an institutional cacophony of interests of international and local actors supposed to jointly validate sites. The additional industry audits appear guilty of at least partly neglecting local realities. Assessing the sites validated so far (and subsequently to be introduced where possible into the iTSCi scheme), many raise serious concerns about the credibility of the whole traceability effort (Johnson, 2013). While the validation exercise (and its periodic iterations) is supposed to systematically denounce illicit taxation practices by both state and non-state actors, reality proves to be more complex. Technically, a ‘green’ validation means no more than the site in question was free from illicit practice at the time of validation. Whether a day before or after such validation the site continues to comply with OECD standards is impossible to ascertain with the current static procedure.

6. Conclusion

With all this, the ‘conflict minerals’ approach appears to arrive at a critical juncture, facing two possible futures. If a more nuanced analysis can contribute to reshaping currently existing rules and policies within broader processes of state and governance reform as different researchers and analysts (Seay, 2012) have suggested, a reliable and viable system ensuring more ethical products are produced and consumed and leading to improvements in the daily lives of the Congolese is possible. This includes first and foremost a finer analysis of Congo’s ASM sector and the local geography of mineral trade on the one hand as well as of underlying problems creating violence and instability in the region on the other.²¹

Failing this, current efforts to ‘clean up’ the sector risk descending into ‘green-washing’, whereby multinational companies and Western governments improve their public image, while in the

²⁰ Cf. Ministère des Mines (2013) : Rapport de la Réunion d’Evaluation des Activités du Programme iTSCi en RDC du 19 au 21 Septembre 2013. République Démocratique du Congo, Kinshasa.

²¹ See, for example, an open letter signed by 72 Congolese and international scholars, analysts, and practitioners calling for a more nuanced understanding of the ‘conflict minerals’ conundrum and the wider conflict dynamics in Eastern DRC at www.christophvogel.net/mining.

Congo – the country on which this image is founded – no solutions are found, just new modes of disarticulation and dispossession created. Therefore, future scholarship would do well to investigate further avenues for understanding the current transformation and collision of economic bordering and ordering practices and overlapping laws, conventions, rules, and norms, while also engaging in a more profound debate on the interplay between local and international resource governance and the various transmission belts (advocacy, business, and international cooperation) connecting these spheres.²²

Acknowledgements

Ben Radley would like to thank Arizona State University, Heartland Alliance International and Trans Africa Media for their support of his field research. Christoph Vogel would like to thank the University of Zurich, the Swiss National Science Foundation, the Mercator Foundation, and the Usalama Project for their support of his field research.

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²² In the Congolese case, this could include in-depth studies on different groups of actors forming the upstream supply chains and – in a more medium term – research on what new types of economic governance and public authority develops under the merger of transnational regulation and national as well as local rules and customs. Further down the line, studies on how (in-)security providers react to the changing framework and whether or not they actively challenge it, or how they adapt strategies of income generation, would be welcome. In addition, similar cases such as the Kimberley Process for diamonds could be used for comparative purposes.

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