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CONGO
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Fighting Corruption and Reducing Impunity in the Democratic Republic of Congo

Fostering transparent management of natural resources and revenue maximization

Progress report

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Executive Summary

Established in 2018, the “Congo Is Not For Sale” consortium (CNPAV) unites 14 international and Congolese civil society organizations, citizen movements, think tanks, and media outlets to combat corruption and reduce impunity in the Democratic Republic of Congo (DRC), with support from the Belgian Directorate-General for Development Cooperation and Humanitarian Aid (DGD). CNPAV members collaboratively and successfully investigated, exposed, and campaigned against high-level corruption in public finance management and natural resources governance between 2018 and 2021. While corruption remains one of the most pervasive challenges faced by the DRC, which has devastating social, political, and economic impacts, CNPAV has become one of the most respected and formidable voices in anti-corruption campaigns and policy reforms in the DRC.

With continued support from the Kingdom of Belgium, the current project builds upon our successes to further empower civil society as primary agents of change. To this end, the project has awarded subgrants to foster and mobilize a diverse coalition of international and national civil society organizations, journalists, academics, and whistleblowers. Their collective efforts are directed towards combating corruption and reducing impunity, aiming to maximize and optimize public finance in the DRC and ensuring transparent and accountable management of natural resources. The project’s activities are concentrated on anti-corruption campaigns in the governance of natural resources and elections and addressing misappropriation and embezzlement of public funds.

During the reporting period, CNPAV and its member organizations concentrated on data collection, reporting, advocacy, and community awareness campaigns addressing corruption case studies and misappropriation in natural resource governance, public finance, and elections. Additionally, CNPAV organizations organized public events such as conferences, training sessions, platforms for popular expression, discussion forums, peaceful demonstrations, and media interviews. CNPAV organizations established a news monitoring system through newsletters and podcasts, enabling the coalition to denounce cases of corruption and misappropriation and raise awareness of their impacts. These efforts led to significant achievements and set the stage for more extensive advocacy campaigns and citizen mobilization in the fight against corruption in the upcoming period.

Key successes and progress achieved, to which CNPAV contributed during this reporting period include:

- Cancellation of irregular and opaque tenders for licensing and granting rights of oil and gas blocks.
- Disclosure of annexes to the 2022 settlement between the DRC government and Ventora Group
- Conviction of Glencore in Switzerland for corruption practices in the DRC.
- Renegotiation of the Sicominex “minerals for infrastructure” deal between Chinese companies and the DRC.
- Successful campaign for criminal charges against Francis Selemani in South Africa.

- Improved technical capacity of civil society actors and journalists in investigations of corruption practices.

Project Progress by Objectives

Objective 1: Increase accountability and prevent cases of corruption in the extractive sector to increase state revenue and opportunities for social and economic investment.

Building on successes and progress achieved over the previous programming, the CNPAV Coalition is advocating transparency and accountability in four cases of corruption and public fund mismanagement, including Dan Gertler's deal and Glencore's corruption practices, the Sicomines deal, Simon Cong's assets and the lithium sector, and hydrocarbon block licensing and rights granting processes.

Case 1: Dan Gertler and Glencore

In recent years, Dan Gertler has become a symbol of corruption in the DRC extractive sector. Over nearly two decades, he leveraged his rapport with former President Joseph Kabila and senior officials to acquire undervalued mining and oil assets through bribes, reselling them at higher prices. He also acted as an intermediary in corrupt practices between DRC state-owned enterprises and multinational companies, notably partnering with Glencore. According to CNPAV's 2021 financial analysis, "[Billions Lost](#)," the DRC has lost over \$2 billion as a result of dubious mining and oil deals with the Israeli businessman. Dan Gertler's questionable practices in Congo's extractive sector led to U.S. sanctions against him. When U.S. President Donald Trump granted a reprieve of those sanctions in 2021, CNPAV members and partners successfully advocated for President Biden to reinstate them. Additionally, CNPAV successfully lobbied for the European Parliament's Human Rights Committee to adopt a resolution proposing sanctions against corrupt actors like Gertler.

While CNPAV's awareness-raising efforts have successfully exposed Gertler's corruption, CNPAV has not yet achieved its goal of recovering these funds or bringing criminal charges against him. With the DRC set to lose an additional \$1.7 billion in future royalties to Gertler if no action is taken during this reporting period, CNPAV engaged in data collection, advocacy, and awareness-raising. Details of these efforts are as follows.

Successfully advocated for the release of the entire agreement between Gertler and DRC government

In February 2022, the DRC government and Ventora Group signed an agreement to resolve disputes over mining and oil assets acquired by Dan Gertler under Joseph Kabila's regime. Due to CNPAV's advocacy efforts, the settlement was published in December 2022. However, two key annexes detailing the practical modalities for implementing the settlement were not disclosed. The CNPAV Coalition continued its advocacy, issuing press releases and organizing press conferences to urge the DRC government to publish these annexes. CNPAV also collaborated with the DRC's technical and financial partners, including local teams from the IMF (International Monetary Fund) and World Bank. As a result, these annexes were published by the DRC [Ministry of Mines](#) in 2023.

The CNPAV Coalition analyzed the settlement and its annexes, uncovering inconsistencies and imbalances detrimental to the DRC people. Surprisingly, the DRC government recognized Dan Gertler’s right to continue collecting royalties of at least USD 250,000 per day for over ten years, committed to advocating for the lifting of US sanctions on Gertler, and agreed to pay him USD 189 million instead of seeking compensation for the billions lost over the past 20 years.

Given these significant imbalances, Resource Matters, with support from CNPAV members, particularly the Carter Center’s team, developed a policy paper outlining corrective measures to the 2022 settlement and proposing alternative agreement provisions to ensure a fair deal for the Congolese people, who lost billions in opaque and corrupt deals with Gertler.¹ The policy paper strongly recommends canceling Gertler’s right to collect royalties from the Mutanda Mining (MUMI), Metalkol, and Kamoto Copper Company (KCC) projects, which should be due to Gécamines and the DRC government. It also recommends that Gertler compensate the DRC people for damage suffered because of his corrupt and illegal deals. It calls on the Congolese government to renegotiate the agreement, considering Gertler’s history of corruption, and urges the United States not to lift sanctions against him.²

CNPAV has been leveraging this policy paper to advocate for renegotiating the 2022 agreement with Mr. Gertler. Over the coming months, CNPAV will continue pushing to renegotiate the 2022 settlement.

Increased community awareness in Haut-Katanga and Lualaba to engage in advocacy efforts and campaign for the recovery of lost assets in deals with Dan Gertler.

Community awareness and citizen mobilization activities are essential for effective anti-corruption campaigns. For instance, during CNPAV’s previous programming, awareness efforts were pivotal in exposing Gertler’s “Yabiso Initiative” as a cover to protect his ill-gotten gains. During this reporting period, FILIMBI and LUCHA organized public events in Lubumbashi and Kolwezi, including peaceful demonstrations, media interviews, and sit-ins, to enhance community awareness and ensure citizen involvement in anti-corruption campaigns.

These activities aimed to sensitize DRC citizens and communities to engage in advocacy efforts and a campaign to recover lost assets from corrupt and opaque deals with Dan Gertler, particularly the \$1.7 billion in royalties from the three mining projects mentioned. As a result, community members joined the rally and expressed their willingness to participate in the campaign to recover lost assets in these deals.

However, in December 2024, the CNPAV coalition received information suggesting that the DRC government and Dan Gertler are renegotiating their 2022 agreement. Instead of reclaiming the royalties for free, the government appears willing to pay back royalties despite Mr. Gertler’s corrupt and fraudulent practices in acquiring them. In the coming period, with the support of FILIMBI, and LUCHA, CNPAV will continue to mobilize communities and citizens by leveraging findings and recommendations from various report case studies.

¹ The policy paper can be found in Annex 1.

² An August 2024 CNPAV press release is included in Annex 2.

Supported victims in preparation of a lawsuit against Dan Gertler and affiliates for the Metalkol case

From September 2023 to December 2024, AFREWATCH assisted victims of abusive contract termination in the Metalkol mining project operated by Dan Gertler’s company and affiliates in Lualaba. They organized a group of 12 victims and hired UK lawyers to prepare the Metalkol case. However, the UK Serious Fraud Office (SFO) rejected their claims. Over the coming months, AFREWATCH will prepare a formal complaint to be filed against Dan Gertler and an appeal to understand why the victims’ claims were rejected.

Engaged in advocacy campaign to maintain US sanctions against Dan Gertler (USA/Europe)

The Carter Center, RAID and Resource Matters, alongside other CNPAV partners and US-based NGOs, successfully advocated delaying any easing of US sanctions against Dan Gertler until there was a measurable change in behavior by himself and his companies. Through meetings with senior representatives from the State Department, the Treasury, and the US Congress, as well as the publication of a document outlining “red lines” for civil society, our efforts resulted in the maintenance of these sanctions until February 2025. In this campaign, engagement with media outlets, including the *New York Times* and the *Financial Times*, was also critical as these media published articles on the issue.

Over the coming months, the CNPAV coalition will continue to monitor sanctions against Dan Gertler and mobilize communities and citizens. It will use findings and recommendations from different report case studies to ensure the renegotiation of the 2022 agreement and the signing of an equitable deal between DRC and Mr. Gertler.

Collected data in preparation of the Mutanda Mining case study report

Mutanda Mining is the world’s largest cobalt mining project. During the reporting period, The Carter Center team successfully collected and analyzed data on corruption practices related to transactions and deals involving the Mutanda Mining project. The data revealed that Gécamines and the DRC lost billions in revenue due to undervalued and corrupt transactions signed between 2007 and 2015. Key findings indicated that Gécamines sold its lucrative assets, shares, and rights in the project for approximately \$250 million to various actors, particularly Dan Gertler, who subsequently gained billions.

The case study highlighted several shortcomings and inconsistencies, including:

- **Legal breaches** in negotiating and signing significant deals and transactions, particularly the lack of DRC government approval.
- **Lack of evaluation** of the mining assets sold.
- **Absence of tenders** and assessment of contracting companies’ technical and financial capacities.

- **High political interference** in the negotiation process of transactions and deals, especially from the DRC Presidency.

With support from CNPAV organizations, including Resource Matters, The Center is finalizing a case study report to be published in the first quarter of 2025. The CNPAV Coalition plans to leverage this report's key findings and recommendations to advocate for a comprehensive and independent audit of all transactions related to the Mutanda Mining project. Additionally, they will push for renegotiating the 2022 agreement between the DRC and Ventora Group.

Advocacy efforts led to Glencore's conviction in Switzerland for failing to prevent and halt corruption practices.

Despite the December 2022 settlement between Glencore and the DRC, investigations in Switzerland and the Netherlands are still ongoing. They focus on Glencore and Gertler's partnership in Congolese projects such as KCC and MUMI. Throughout 2023 and 2024, Resource Matters and RAID have been in contact with Dutch investigative authorities and the UK Serious Fraud Office (SFO), providing them with documents related to Glencore's corruption allegations in the DRC. Their goal is to enhance Glencore's accountability for its activities in the DRC.

In August 2024, Glencore was sentenced in Switzerland for failing to prevent and halt corruption practices in opaque and corrupt transactions between Dan Gertler and Gécamines in a mining project where Glencore is the major shareholder. Switzerland convicted Glencore and fined it \$152 million.

While Glencore's conviction is a positive step toward accountability and a result of long-term advocacy efforts by CNPAV Coalition members and other CSO groups, Congolese victims were not recognized in the verdict and, therefore, cannot benefit from the fines paid by Glencore. The CNPAV Coalition continues to advocate for recognizing Congolese victims and has organized meetings with Swiss MPs to discuss the issue in Swiss Federal Assembly sessions.

Supported legal proceedings in the United States for the recognition of Congolese victims in the amicable settlement reached with Glencore.

In collaboration with volunteer lawyers from the Legal Aid Center (CAJJ) based in Kolwezi and a lawyer from the New York Bar, RAID has been advocating for the payment of compensation to former Crusader Health workers as indirect victims of Glencore's corruption practices. After identifying and engaging with the affected workers, a remission procedure was submitted to the US General Attorney, effective June 17, 2024. This initiative is groundbreaking, as it represents one of the first attempts to compensate Congolese victims of corruption for a fine paid by a multinational in the United States. The process is underway, and RAID and CNPAV are awaiting official communication from the U.S. authorities.

In addition, RAID and the CNPAV Coalition issued a press release denouncing the impact of Glencore's corruption practices on Congolese workers and calling for their compensation. This message was relayed on the social media of CNPAV, RAID, and Transparency International and generated significant interest among organizations committed to the fight against corruption. At the same time, RAID's Executive Director presented the project during a panel at the International

Anti-Corruption Conference (IACC) in June 2024 in Vilnius, a major event bringing together influential actors from the public, private, and civil society sectors to promote justice and transparency worldwide.

Supported legal proceedings against Glencore in the Netherlands and the Eurasian Resources Group (ERG) in the United Kingdom

With support from the CNPAV Coalition, RAID and AFREWATCH have been working with British lawyers to secure legal proceedings against Glencore and the Eurasian Resources Group (ERG) in the Netherlands and the United Kingdom. The lawyers recruited advised CNPAV and its members not to make any public statements on this case until a decision is obtained from the UK Legal Aid Commission.

Additionally, RAID and Resource Matters met with the Serious Fraud Office in the UK to understand the discontinuation of the corruption investigation against Glencore and supported Congolese victims by filing a formal application for judicial review. With the support from volunteer lawyers, the victims obtained pro bono legal aid in December 2024, and the case is now awaiting a court decision for a possible judicial review, which could lead to official recognition of victims of corruption in the UK courts.

Contributed and signed joint letters with other NGO networks urging the EU Commission to move forward with the adoption of an anti-corruption sanctions regime

Over the first quarter of 2024, Resource Matter's staff had productive conversations with EU senior officials on adopting an EU anti-corruption sanctions regime. In addition to these bilateral conversations, Resource Matters and RAID jointly worked with a coalition of organizations on the EU sanctions regime and lobbied MEPs. Together with this group, Resource Matters co-signed several letters to EU MEPs, explaining the relevance and possible ways to adopt such a regime. As a result, an anti-corruption package proposal, which included sanctions, was drafted at the EU level. However, the proposal was prematurely leaked in April 2024, revealing disagreements among various countries and institutions. This led to a several-month stall in the process as the willingness to discuss the matter within EU institutions diminished.

Nonetheless, the CNPAV Coalition persisted in bilateral discussions with US senior officials and sent multiple letters and statements to the US Administration, advocating for the continuation of sanctions against Dan Gertler.³

Organized training sessions on monitoring and combating corruption in the extractive sector

Between October and December 2024, CNPAV member LUCHA hosted three training sessions in Kinshasa and Lubumbashi for its members to build their capacity on extractive sector governance and techniques to investigate and monitor corruption practices in the extractive sector. These training sessions enabled and improved LUCHA members' technical skills in the investigation and monitoring of corruption practices in the extractive sector, particularly in the mining sector.

³ The letter sent to the US Administration are included in Annex 3.

Case 2: The Sicomines Deal⁴

The Sicomines deal was signed in 2008 as a “minerals for infrastructure” agreement between the DRC and Chinese companies. Under the original deal, Chinese companies were granted mining rights to copper and cobalt deposits in exchange for infrastructure investments worth \$3 billion, which would be repaid by future revenue from the mining project (Sicomines). The joint venture consisted of a 68% stake in the Group of Chinese Enterprises (GEC) and 32% in DRC’s Gécamines.

The deal has been widely criticized by civil society for disparately favoring Chinese companies, and a [2015 report by ASADHO](#) uncovered severe misreporting of its achievements, which was further confirmed through 2021 publications by CNPAV member [AFREWATCH](#) and the [DRC Extractive Industries Transparency Initiative](#). They both found that the Chinese companies have continuously failed to meet their obligations while having opaque finances. Over the past 15 years, CNPAV members have continued to advocate for the renegotiation of the Sicomines deal due to its imbalances and inconsistencies, which foster corruption and fund misappropriation, undermining the benefits for the Congolese people. During this period, this advocacy resulted in the renegotiation of the deal, as detailed below.

Advocacy campaign for the renegotiation of the Sicomines deal

In response to civil society’s recommendations, President Tshisekedi appointed a commission in 2023 to renegotiate the deal. However, the commission was inadequately prepared for the renegotiation, lacking a clear mandate and terms of reference. Additionally, the DRC government did not commission an independent audit of both the mining and infrastructure components of the partnership. The commission also operated opaquely, failing to disclose any information about the renegotiation process.

In January 2024, President Tshisekedi announced the “key outcomes” of the Sicomines deal renegotiation process, which would include an additional “[US\\$ 7 billion](#)” for infrastructure. Following this announcement, Amendment 5 to the Sicomines deal was formally signed in March 2024 by Chinese companies and the DRC government as the outcome of the renegotiation process. Due to the CNPAV Coalition’s pressure and lobbying efforts, the amendment was published on May 1, 2024, in compliance with DRC laws and transparency commitments. However, the provisions of the amendment fall short of the optimism expressed by DRC officials regarding the renegotiation outcomes.

With support from Resource Matters and AFREWATCH, The Carter Center has conducted a deeper analysis of key provisions in Amendment 5. The study revealed that the victory and optimism claimed by DRC officials regarding the renegotiation outcomes are illusory, as the amendment maintains and exacerbates imbalances and inconsistencies to the detriment of the Congolese people. For instance, the amendment now ties infrastructure financing to copper prices

⁴ Please note that the Sicomines deal was previously included in the second case with Simon Cong. We have separated out this case for clarity’s sake, but the proposed activities remain the same.

on the world market. Consequently, the US \$7 billion announced by President Tshisekedi is hypothetical, as the funds for infrastructure entirely depend on copper prices, which are beyond the DRC's control.

Additionally, the amendment preserves Gécamines' minority shares (32% versus 68% for Chinese companies) in the Sicominex joint venture and its *ad hoc* functioning, which contradicts DRC laws and regulations on public fund management. The CNPAV Coalition sent a letter to the DRC ministers who signed the amendment to better understand the rationale behind key provisions, particularly those compromising DRC interests in the partnership. However, the ministers did not respond to the CNPAV Coalition's inquiries.⁵

Data collection on the Sicominex infrastructure and the Busanga hydropower project

Infrastructure development for the Congolese people is a central pillar of the Sicominex deal. However, these projects have been plagued by a lack of transparency and accountability, overcharging expenses, and inadequate quality of constructed infrastructure. Over the reporting period, AFREWATCH staff collected data and inventoried infrastructure built under the Sicominex deal from 2009 to 2024. Data collected on 22 infrastructure projects showed that these projects had been executed outside of DRC legal procedures on public finance management and violated the Public Procurement Law. As such, the payment methods documented do not comply with the DRC legal procedures.

Additionally, OEARSE collected data on the Busanga hydropower project, which supplies electricity to the Sicominex venture. Although the Busanga hydropower project is intended to be a joint venture between the DRC and Chinese companies, a shell company connected to former President Kabila holds a stake in the project instead of the DRC government. OEARSE has been gathering data to better understand Kabila's involvement in the project and to explore appropriate methods for transferring these stakes to the DRC government. Following the revision of the agreement on the Busanga project in the framework of the Sicominex deal renegotiation, the data collected revealed that the Busanga hydropower is not a project primarily reserved for the Sicominex joint venture and other actors/clients are using energy from Busanga. Moreover, there is no clear guidance on DRC's representatives in the Busanga project regarding the transfer of 40% of shares to DRC and the replacement of the company close to Joseph Kabila in the project.

With support from the CNPAV Coalition, The Carter Center, AFREWATCH, and OEARSE are finalizing research reports on Amendment 5 to the Sicominex deal, infrastructure projects, and the Busanga hydropower project, which will be published over the coming months. The findings and recommendations from these reports will be used in advocacy campaigns to renegotiate Amendment 5, cancel the *ad hoc* regime of the Sicominex deal, ensure the effective transfer of Joseph Kabila's shares in the Busanga project to the DRC, and promote greater transparency and accountability in infrastructure development.

Case 3: Simon Cong's Business and the Lithium Sector

⁵ This letter is attached in Annex 4.

Unlike Gertler, who has become a renowned figure of corruption, Cong Maohuai (a.k.a. Simon Cong) is less notorious despite engaging in similar practices. However, Cong and his affiliates have been the subject of several additional CNPAV member investigations, including his role in negotiating the Sicomines deal between 2007 and 2008. Additionally, several CNPAV members, including PPLAAF, were heavily involved with the [Congo Hold-up investigation](#) which uncovered extensive corruption, misappropriation, and money laundering practices involving Mr. Simon Cong, as well as former President Kabila’s relatives and associates, including Zoe Kabila, Francis Selemani, and Moïse Ekanga, the former Executive Director of the DRC-China partnership Bureau.

In addition to Mr. Cong, both Moïse Ekanga and Zoe Kabila were uncovered to be shareholders of the company managing the tolls between Kolwezi and Kasumbalesa—one of the country’s most active export routes. With roughly 1.5 million tons of copper and cobalt metals transported yearly and steep tolls of upwards of [\\$900 per trip](#), an estimated \$238 million is unaccounted for. CNPAV continues working to document corruption cases in the lithium sector and increase the visibility of Mr. Cong’s 15-year track record. Key activities and successes from this reporting period are as follows.

Successfully campaigned for criminal charges against Francis Selemani in South Africa

Following the Congo Hold-Up investigation, PPLAAF has continued to collect additional data on corruption, which they used to file a formal complaint against Francis Selemani with the South African National Prosecuting Authority (NPA) for misappropriation and money laundering. Francis Selemani, the adopted brother of Joseph Kabila, was the former CEO of BGFI Bank’s DRC branch. The Congo Hold-Up investigation and additional data revealed how Selemani misappropriated DRC public funds, including Sicomines infrastructure funds, and laundered money to acquire properties in South Africa.

Collected data on corruption allegations in the lithium sector

Over the past eight years, the DRC’s lithium sector has experienced rapid growth in the Tanganyika and Haut-Lomami provinces. Lithium is a critical mineral for manufacturing electric batteries, essential for the global transition to green energy. Following the DRC IGF’s summary report on the sector and the previous work of CNPAV members over the past four years, CNPAV decided to conduct a comprehensive investigation into corruption and bribery practices in the licensing and joint venture contract processes.

The Carter Center and AFREWATCH have been collecting data on lithium sector transactions to document potential corruption practices in these processes. The data collected during the reporting period highlighted serious allegations of corruption. Mr. Simon Cong has been identified as a key player in corrupt transactions between DRC officials and multinational companies. The CNPAV Coalition views Simon Cong as the “Dan Gertler of the lithium sector.”

With the support from the CNPAV Coalition, The Carter Center and AFREWATCH will complete data collection and publish the report in the following reporting period. The report’s findings will serve as an advocacy message for revising corrupt deals and promoting transparency and accountability in the licensing and joint venture contract processes.

Case 4: Monitoring Hydrocarbon Block Licensing and Rights Granting Processes.

Like the mining sector, the hydrocarbon sector in the DRC is also plagued by corruption and opaque transactions. In the lead-up to the 2006 election, the DRC signed a production-sharing contract for an oil block in the Atlantic Ocean for \$500,000. A few years later, the DRC repurchased the block for \$150 million—300 times the original amount, which have been subject to tenders that have been cancelled. Similarly, the DRC owes over \$200 million to DIG Oil and Dan Gertler despite minimal exploration of the oil blocks they controlled.

These blocks have not generated any revenue and have cost the state over \$1 billion in losses. However, in the lead-up to the election, in July 2022, the DRC government initiated a call for tenders for 27 oil blocks and three gas blocks. This process not only existed in total opacity, but it also violated DRC laws, and it posed risks of indebting the country and causing destruction of biodiversity, as some oil blocks overlap with national parks. As such, this project is focused on monitoring hydrocarbon block licensing and advocating for transparency.

During this period, CNPAV produced a report and launched a successful advocacy campaign, which resulted in the cancellation of hydrocarbon tenders. Details are as follows.

Successful advocacy campaign that resulted in the cancellation of the hydrocarbon tenders

The CNPAV Coalition launched a monitoring campaign and research initiative to monitor corruption practices and prevent public indebtedness. CdC/Ituri and The Carter Center have been collecting data on the tender process and previous oil and gas licensing and rights granting processes. With support from the CPNAV Coalition, CdC/Ituri and The Carter Center published a report on the risk of debt rather than revenues in May 2024.⁶

Key findings from the report include:

- A significant lack of transparency and accountability in the tender process.
- Violations of DRC laws on hydrocarbon tenders, especially for oil blocks under litigation.
- Increased risks of public indebtedness based on previous processes rather than expected revenues.
- Uncertain profitability of hydrocarbon blocks subject to tenders due to inadequate geological data.
- Open flouting of legal and regulatory criteria for granting, notably by signing oil production sharing contracts with unqualified companies.

After the report was published, the CNPAV Coalition initiated an advocacy campaign urging the DRC government to cancel the hydrocarbon tenders. Congo Nouveau organized social dialogue sessions, press conferences, and radio-television broadcasting campaigns in Goma, Bukavu, and Beni during May, June, and July 2024. They used the report's recommendations to highlight the need to cancel the tenders, which have inconsistencies, risks of indebting the country, and potential environmental and biodiversity destruction.

⁶ The report can be found [here](#), but is also included as Annex 5.

As a result of CNPAV’s research and advocacy, the Minister of Hydrocarbons signed an [Executive Order](#) on November 11, 2024, to cancel the tenders because of the identified irregularities and lack of competitiveness. This accomplishment illustrates that CNPAV’s efforts translate into meaningful progress in promoting transparency and accountability in the DRC’s hydrocarbon sector.

Objective 2: Increase accountability for cases of election-related corruption and increase public attention on corruption-related issues during the electoral process to strengthen the legitimacy of electoral outcomes and ensure combatting corruption is a priority for office seekers.

Under this objective, the CNPAV Coalition and its member organizations have been working to combat electoral corruption and fund misappropriation in electoral processes to strengthen democracy and the legitimacy of political institutions. Based on documented corruption practices over the past four electoral cycles, our actions focus on the financial management of CENI, the Constitutional Court, political parties, and security services.

This objective includes key complementary components, such as strengthening the coordination and capacities of civil society groups to fight corruption in electoral processes, particularly in election financing. This involves monitoring the disbursement of funds at the level of the Public Treasury and CENI and ensuring that the fight against corruption becomes a central theme in elections so voters remain aware of the influence of corruption beyond the electoral process.

Unfortunately, the delays in starting this project did not allow sufficient time to prepare for achieving the initial objective, and the CENI had already completed procurement processes before the project began. Nonetheless, The Carter Center’s Citizen Observation Program facilitated a training session for CNPAV members on election observation and international standards designed to assess the quality of elections. This training enabled CNPAV members to prepare the data collection questionnaire and a checklist of aspects to assess and observe during the electoral processes.

Moreover, during this reporting period, CNPAV sensitized DRC citizens on anti-corruption, continued to monitor the electoral budget, spending, and corruption in election finance, and hosted popular expression forums in two cities. Details of these activities are as follows.

Organized the “My Voice is Not for Sale” campaign during the December 2023 general elections

From December 2023 to April 2024, CdC/Ituri, Congo Nouveau, and Filimbi organized public campaign sessions titled “My Voice Is Not for Sale” in Bunia, Goma, Lubumbashi, and Kinshasa. These sessions raised awareness about the harmful effects of electoral corruption. They emphasized the importance of citizen monitoring during the general elections in December 2023 and the indirect elections for provincial governors and senators in March and April 2024.

The campaign helped the population in targeted areas understand the risks and impacts of electoral corruption on governance and the accountability of elected officials. As a result, some sensitized citizens could monitor and report corruption practices and other electoral irregularities. For example, in Ituri, citizens sensitized by CdC/Ituri identified and reported several cases of vote-

buying and irregularities, including 12 cases of vote-buying during direct elections by provincial and national MP candidates (8 in Bunia and 4 in Irumu). There were also 4 cases of voting machines being held in the homes of MP candidates in Bunia, Djugu, Mambasa, and Mahagi.



Hosted popular expression platforms on the impact of electoral corruption

In May and June 2024, Congo Nouveau, CdC/Ituri, FILIMBI, and LUCHA hosted popular expression platforms in Kinshasa, Lubumbashi, Goma, Bukavu, and Bunia. The platforms allowed provincial members of parliament, local elected officials, and citizens to discuss electoral corruption's impact on the reconstruction and development of the DRC.

These popular platforms helped raise awareness and educate citizens, the public, and elected officials about the impact of electoral corruption in the DRC. They fostered constructive discussions, allowing citizens to express their concerns and better understand electoral dynamics. They also improved knowledge of accountability issues, particularly the link between corruption in senatorial elections and elected officials' low accountability level. Finally, interactions and discussions allowed citizens and provincially elected officials to better understand the impact of corruption on the country's governance, as it undermines officials' accountability.

Continued monitoring of the electoral budget and spending and corruption practices

Historically, elections in the DRC have been plagued by overcharging expenses, fund misappropriation, corruption, and conflicts of interest. For instance, during the 2023 elections, alleged corruption led the CENI to cancel the [outcomes of legislative elections for 82 candidates](#). Additionally, DRC courts annulled many voting results and invalidated several national and provincial parliament members and local elected officials.

Ebuteli conducted thorough research to gather evidence on key corruption practices during the 2023 general elections to better advocate accountability and combat corruption in the DRC electoral processes. This research involved documenting corruption practices at polling stations, CENI's vote outcome compilation centers, and within the judicial system as part of electoral litigation. After conducting more than 350 interviews with stakeholders on corrupt practices that affected direct and indirect elections, the study allowed Ebuteli to identify the main drivers and actors of electoral corruption practices.

These include poor accountability mechanisms within CENI management, political interference, legal deficiencies in financing political parties and electoral campaigns, and the vulnerability of

judicial authorities and security services to corruption. Other factors included electoral violence and political intolerance.

Preliminary findings identified key players such as senior CENI officials, the DRC President, the Government, Parliament, the judicial system, political parties and groupings, and candidates. The report will be finalized in the coming months, and its findings will serve as a basis for advocating necessary reforms and potential legal proceedings.

Objective 3: Intensify public scrutiny and provoke action on cases of corruption with strong macroeconomic and political resonance to curtail excessive lifestyles of high-profile public figures

For the past 30 years, the capture of resources and the lavish lifestyles of the political elite have been significant challenges in managing public finance and resource distribution in the DRC. While over 70% of Congolese people live in extreme poverty, political elites, including the President, Ministers, MPs, Senators, CEOs of state-owned enterprises, senior advisors, and officials enjoy substantial remunerations and benefits. This ongoing misallocation and misappropriation of public funds worsen social inequalities within Congolese society.

The CNPAV coalition highlights these disparities between the general population and political leaders, the budgets allocated to projects of collective interest, and the misappropriation of public funds within the Congolese administration. We are working to revive and stimulate the debate on improving the population’s living conditions and the functioning of institutions.

During this period, CNPAV organized and executed a media campaign to raise awareness of politicians’ lifestyles and collected data on resource capture in preparation for the publication of a landmark report on DRC budget allocations. Details of these activities are as follows.

Organized sit-in at the national Parliament and media campaign on politicians’ lifestyle

In September 2024, FILIMBI held a sit-in at the National Parliament building during the opening ceremony of the budgetary session. The purpose of the sit-in was to urge MPs to reduce politicians’ extravagant lifestyles and allocate more resources to social projects. The sit-in generated a clear message for the reduction of politicians’ lifestyle political institution maintenance costs and fueled public debate on politicians’ lifestyles.



Additionally, FILIMBI staff conducted 20 radio broadcasts to raise awareness among a broad audience about the importance of reducing the state's standard of living. They also produced 20 television broadcasts, reaching an even larger audience and reinforcing the message about the need to redirect resources to essential sectors. Finally, they created an [educational video](#) that highlighted the stark contrast between the lavish lifestyles of the political elite who exploit the country's resources and the everyday lives of the general population.

Successful data collection for a landmark report on excessive costs of political elites' remunerations and institutional maintenance

To better understand the phenomenon of resource capture by the political elite and the resulting inequalities, UNIS conducted a comprehensive investigation into DRC budget allocations. This investigation compared politicians' remunerations and maintenance costs with budget allocations for social expenditures.

The investigation confirmed the political elite's capture of resources and provided a detailed analysis of unfair budget distribution practices. It highlighted that a small group of political elites receive a disproportionate share of budget resources, while most of the DRC population receives minimal funding for social services. For example, the research revealed that while remunerations and maintenance costs for political institutions were executed at 121.7% over the first quarter of 2024, some budget lines for social expenditures, such as decentralized services and scholarships, were not fully disbursed.

With support from CNPAV, UNIS will publish the report in the first quarter of 2025, and its recommendations will be used to generate public debate on reducing political elites' remunerations and institutional maintenance costs.

Objective 4: Ensure corruption is prioritized and maintained on political agendas and in public debate

In recent years, numerous cases of large-scale corruption have been exposed without prompting action from political or judicial authorities in the DRC. To tackle this issue, CNPAV members established a news monitoring system focused on corruption. This system enables the denunciation of corruption cases while supporting public and private initiatives aimed at enhancing transparency and accountability.

The CNPAV Coalition members have been jointly monitoring and denouncing various cases of corruption to promote direct accountability of the involved actors and raise awareness among the Congolese population. Actualité.CD has been coordinating this effort through three rotating members of the CNPAV, ensuring that member organizations specializing in natural resources, political affairs, public fund management, and citizen movements have media space to speak out. A Corruption News called *Kanyaka-Rushwa Newsletter* has also been launched by Unis and published news and educated the population about corruption.

Training sessions for Actualité.cd journalists on accountability and public fund management to prepare media coverage of CNPAV's activities and the Corruption News

From February 16-20, 2024, Actualité.cd hosted a training session for their journalists in Kinshasa. The session brought together ten journalists from Kinshasa and other DRC cities, focusing on transparency and data collection in public finance management and techniques for monitoring the mining sector. As a result, the trained journalists are now well-prepared to collect data and produce podcasts and videos on corruption practices in public finance management and the mining sector.

Hosted two discussion forums on electoral corruption practices.

In April 2024, Actualité.cd hosted a discussion forum titled “Electoral Corruption: What Future for Democracy in the DRC?” The forum brought together civil society actors, representatives of political parties, and journalists to focus on corruption cases identified during the 2023 general elections and strategies to combat electoral corruption in the DRC.

Key topics discussed included corruption practices observed during electoral periods, financing of electoral campaigns, the legal framework for financing political parties, and the obligations of political parties to access state subsidies. The forum successfully raised awareness among civil society actors, political party executives, and the media about the need for a committed effort to fight electoral corruption.



The second forum brought together journalists, public finance experts, and CSO representatives to discuss how the media can play a more active role in exposing economic crimes and corruption practices during the pre- and post-election periods. Participants urged the CNPAV Coalition to establish a framework for ongoing discussions on corruption issues and to provide capacity building for journalists.

Developed podcasts and videos on corruption practices

During the reporting period, Actualité.cd produced four podcasts and four animated videos to raise awareness about corruption practices in electoral processes. While the two podcasts are intended for a limited audience as they are in French, the two videos are designed for a wider audience and have been translated into Lingala, Swahili, Kikongo, and Tshiluba for greater reach. These materials have been uploaded and broadcast on the Next Corp/Actualité.cd platforms.⁷

Publication of the Kanyaka-Rushwa Newsletter

In line with this objective, UNIS launched the *Kanyaka-Rushwa* Newsletter, which publishes corruption cases and provides recommendations for halting corruption. Over the reporting period, UNIS published two issues of the *Kanyaka-Rushwa* Newsletter in July and October 2024. The first issue covered major corruption cases in the DRC from January to June 2024, highlighting significant instances such as overbilling in public procurement (water wells and streetlights), embezzlement related to the national identity card project (USD 700 million), and electoral fraud. It also criticized the ineffectiveness of anti-corruption mechanisms, pointing out the slow judicial proceedings and the lack of political will to hold perpetrators accountable.

The second issue of the *Kanyaka-Rushwa* emerged amid a tougher political stance against corruption. It highlighted reactions to the first issue's revelations, including Glencore's conviction by Swiss courts for corruption in the DRC. The issue also covered embezzlement in higher education, mismanagement of funds for Kisangani war victims (FRIVAO), and corruption in state-owned enterprises. It praised government initiatives like suspensions and prosecutions of officials while underscoring the persistent challenges of impunity.



⁷ These can be viewed on Actualite.CD's Facebook page or at the following links. [Video 1](#), [Video 2](#), and [Video 3](#).

Both issues of *Kanyaka-Rushwa* exposed these facts and offered recommendations to enhance the transparency and accountability of public institutions. They assessed the institutional practices enabling these abuses, provided an overview of judicial and administrative flaws, and proposed reforms to strengthen the fight against corruption.⁸

Successes and Challenges

As this report has illustrated, with Belgium’s support, the CNPAV consortium has achieved several notable successes over the reporting period. CNPAV successfully advocated for the disclosure of the DRC government’s 2022 settlement with the Ventora Group, leading to the publication of a detailed policy paper highlighting the deal’s inequities. Furthermore, CNPAV and other civil society groups’ persistent advocacy against Glencore’s unethical and corrupt practices resulted in its conviction in Switzerland. Similarly, ongoing investigations and advocacy efforts contributed to criminal corruption and money laundering charges against Francis Selemani in South Africa.

CNPAV made enormous progress in raising public awareness of corruption issues. It published two issues of the new *Kanyaka-Rushwa* newsletter and developed videos and podcasts on corruption practices. CNPAV also conducted extensive data collection and research to prepare case studies on several critical issues, including the Sicomines deal, Mutanda Mining, the Busanga hydropower project, the lithium sector, the lifestyles of political elites, the maintenance costs of political institutions, and electoral corruption practices.

CNPAV’s analysis of opaque tenders for licensing and granting rights for oil and gas blocks resulted in the Minister of Hydrocarbons signing an executive order to cancel irregular tenders in November 2024. Moreover, CNPAV’s efforts around the Sicomines deal resulted in the deal’s renegotiation, and while it is a step in the right direction, more work remains.

Despite these successes, the project encountered several challenges. These included escalating violence in the North and South Kivu due to armed conflicts between the DRC Army and M23/AFC rebels backed by Rwanda and a shrinking civic space exacerbated by the announcement of constitutional revisions. Additionally, the launch of activities was delayed due to elections and the subgranting process, and there were difficulties accessing data for some case studies. To address these challenges, The Carter Center, the CNPAV Steering Committee, and the CNPAV organizations have been discussing the potential reallocation of funds. Furthermore, the Steering Committee and CNPAV member organizations have reinforced security measures for CNPAV members. This includes developing a joint and coordinated advocacy action plan that prioritizes collective activities over individual ones, reducing the risk to individual organizations.

Looking Forward

Over the coming months, CNPAV and its members are focused on the following:

⁸ These [newsletters](#) can be found on CNPAV’s website.

- 1) Completing and publishing the remaining case studies analyses on Amendment 5 of the Sicomines deal, Sicomines infrastructure projects, Busanga hydropower, the lithium sector, and electoral corruption practices.
- 2) Continuing advocacy efforts around the following key areas: revising Amendment 5 of the Sicomines deal; revising the 2022 settlement between the DRC and Ventora based on the developed policy paper; revising the Mutanda Mining Project agreement and auditing transactions; reducing the costs associated with politicians' lifestyles and institutional maintenance; promoting transparency and accountability in the licensing and rights-granting processes in the lithium sector; and supporting the EU's adoption of anti-corruption sanctions.
- 3) Maintaining its support to victims of corruption in legal proceedings in the DRC and abroad.
- 4) Continued monitoring of court proceedings, including the case against Glencore in the Netherlands
- 5) Organizing a high-level forum on electoral corruption practices.
- 6) Organizing a round table with the judicial authorities on illicit financial flows and transactions that resulted in the privatization of royalties to the detriment of Gécamines of the DRC.

Project Visibility

Key project activities have received coverage from both local and international media. Additionally, CNPAV and its members have shared significant events and project milestones on their websites and social media platforms, including Twitter and Facebook.

Due to the sensitive nature of corruption issues in the DRC, it was agreed that CNPAV would not include donor visibility materials in reports, public events, or communications. However, CNPAV members have been actively collaborating with officials from the Belgian Embassy in Kinshasa and the Consulate in Lubumbashi regarding project implementation. Additionally, CNPAV members have been meeting with senior Belgian officials both in the DRC and Brussels to share updates on the project, as well as insights into the political, economic, and human rights context and trends in the DRC. CNPAV remains open to any suggestions from the donor on this matter should they wish to be included in external outputs.

Management and Administration

Over the reporting period, the Carter Center and the CNPAV Steering Committee recruited the CNPAV Coordinator, the Subgrant Officer, and the M&E for the project. Additionally, the Carter Center signed 12 subgrants with CNPAV members and disbursed two of three tranches of funds for activity implementation.

Security

The escalation of violence in North and South Kivu provinces has disrupted project activities for CNPAV members based in Goma. Additionally, the announcement of constitutional revisions has further restricted civic space. To address these challenges, The Carter Center and the Steering Committee are exploring options for fund relocation and support for CNPAV members affected by

violence in North Kivu. They are also reinforcing security measures, including developing a coordinated advocacy action plan that prioritizes joint activities over individual ones to reduce exposure risks for organizations.

Annexes

1. Policy paper on equitable agreement between the DRC government and Ventora Group
2. CNPAV press release from August 2024
3. CNPAV's letter sent to the US Administration
4. CNPAV's letter to the Ministers of Mines, Finance, Budget, and Public Works on Amendment 5 to the Sicominex deal
5. CNPAV Report on *Risque des Dettes Plutôt que des Recettes*