



ITSCI response to Global Witness report on Rwanda's coltan

12 June 2026

On 10 June 2026, Global Witness published a report titled "Who buys Rwanda's smuggled coltan? The global journey of conflict coltan from DRC to the world's electronics".

High-level summary

- ITSCI recognises the unique and challenging risks presented by the ongoing conflict in eastern DRC and welcomes Global Witness' continued attention to these issues.
- We have previously called for broad stakeholder dialogue and action, and take seriously the questions raised in the report, including by reviewing any new information to inform further action or possible system improvements.
- The OECD Guidance promotes continued engagement where risks can be mitigated. Certain risks, particularly those involving non-state armed groups, cannot be mitigated and should result in disengagement.
- ITSCI has applied a risk-based approach in Eastern DRC, by suspending activities in targeted areas of North and South Kivu, DRC; and in Rwanda, by taking concrete and targeted actions, including suspensions, high-level incidents, alerts, and strengthened controls.
- This distinction is critical. The OECD Guidance supports a differentiated response based on the nature of the risk.
- Global Witness' recommendation for blanket disengagement from Rwanda is inconsistent with the OECD Guidance. It effectively promotes undifferentiated disengagement and appears to endorse a broader principle of risk avoidance at country level, rather than the OECD-aligned approach of risk-based due diligence and targeted mitigation.
- RMAP 3T audits do not certify minerals as conflict-free. SEC Rules require due diligence efforts and reporting when issues are found but do not have an absolute requirement for conflict-free sourcing.
- We welcome that Global Witness relied extensively on ITSCI's public information but regret that the report disproportionately focuses on ITSCI while giving limited comparable scrutiny to non-ITSCI supply chains.
- Global Witness' report also presents limited new evidence, relies heavily on historical claims, and contains factual inaccuracies.
- Global Witness does not identify specific shipments or transactions linked to conflict financing but instead relies on broad associations with companies operating in or from Rwanda.
- ITSCI remains committed to OECD-aligned due diligence, transparency, and responsible engagement that avoids harmful blanket disengagement from the region.

A complex regional context

The Great Lakes Region and Eastern DRC in particular, have experienced repeated conflicts over the past 30 years, involving state and non-state actors and causing severe harm to local communities. Natural resources are not the root cause of conflict, but they can contribute to its financing. The OECD Guidance, developed in 2010 in a multi-stakeholder process **with input and agreement from Global Witness**, was designed to support responsible sourcing of minerals from Conflict-Affected and High-Risk Areas (CAHRA) aiming to avoid blanket disengagement from Central Africa.

In the last 15 years, ITSCI, [a Programme Fully Aligned with the OECD Guidance](#), has supported responsible sourcing of tin, tantalum and tungsten minerals (the ‘3T’) through traceability, multi-stakeholder engagement and, where possible, risk management and resolution.

While ITSCI supports transparency in line with the OECD Guidance, Global Witness’ call for the publication of commercial information - such as mine production data - goes beyond that agreed framework, which explicitly recognises the need to protect commercial confidentiality. ITSCI makes extensive detailed information publicly available, in particular on incidents, risks, and mitigation actions, to support informed understanding of complex local contexts and supply chain realities.

We welcome Global Witness’ use of ITSCI public information, particularly incidents, and its recognition of ITSCI actions to suspend companies from our Programme. We are therefore disappointed that **Global Witness otherwise disproportionately questions ITSCI’s approach and results, while applying limited comparable scrutiny to non-ITSCI supply chains**. We also welcome the Global Witness report’s emphasis on companies’ own due diligence responsibilities and its acknowledgement that **no mineral supply chain can be certified as conflict-free** - principles at the core to the OECD Guidance and strongly supported and emphasised by ITSCI in all our communications.

Misrepresentation of Due Diligence Framework

Sourcing in and from CAHRA inherently implies the presence of risks and conflicts.

ITSCI does not certify minerals - a one-off verification - but supports proactive due diligence processes. It is a facilitation initiative that provides practical tools to support implementation of the OECD Guidance by establishing mineral traceability; supplying credible first-hand information on activities and risks on the ground; supporting a risk-based process to break links between mineral trade and conflict financing; and facilitating multi-stakeholder engagement to agree risk mitigation measures. ITSCI participating companies use ITSCI information to assess risks in their own supply chains and remain ultimately responsible for their own due diligence.

RMAP audits likewise do not certify minerals as conflict-free.¹ There is a widespread misconception that US SEC Rules require the sourcing of conflict-free minerals, yet the Rules reference the OECD Guidance and simply require reporting by companies of the results of their due diligence. The concept/term ‘conflict-free’ is no longer in use by experts and oversimplifies the reality on the ground.

¹ See RMAP 2017 Tin and Tantalum Standards, disclaimer, page 4: “This assurance process does not result in a material certification nor does it determine that material at the auditee is conflict-free.” https://www.responsiblemineralsinitiative.org/media/docs/standards/Responsible%20Minerals%20Assurance%20Process_Standard_SnTa_EN.pdf

While some other upstream mechanisms in use in Rwanda are recognised by the RMI, we have seen that external ‘recognition’ can undermine our emphasis on company responsibility. In December 2023 we chose to pause the RMI recognition process of ITSCI. The RMI is also in the process of ending its recognition scheme, while highlighting the need for collective efforts and localised knowledge for effective due diligence.²

Continuous engagement rather than blanket disengagement

The OECD Guidance instead promotes continued engagement whenever possible, focused on identifying, assessing and mitigating risks. This is precisely to avoid widespread embargoes, which would cause further harm to already vulnerable communities while keeping the root cause of conflict unaddressed. Where risks cannot be mitigated, the OECD Guidance recommends disengagement. This is why we suspended ITSCI activities in all areas under M23 control.³

Calls for blanket disengagement from Rwanda - as recommended by Global Witness - or from Central Africa as a whole - as some downstream end-users have implemented - therefore contradict the principle of continuous engagement for responsible sourcing laid down in the OECD Guidance.

By calling for blanket disengagement from Rwanda, Global Witness appears to imply that there is no coltan mined in Rwanda. This is not credible: anyone with an understanding of the region knows that coltan is mined in Rwanda. Suggesting that any increase in production and export from Rwanda is solely due to smuggling, as Global Witness does, is incorrect, simplistic, and unfounded. Mining investment and mine developments in Rwanda have been documented over time.

In addition, Global Witness does not distinguish between minerals that may be conflict-related and those that are not. The report does not identify, or provide evidence of, any specific shipments or transactions as linked to conflict financing. Instead, it broadly names companies operating in or from Rwanda and implies that their trade is problematic as a whole. **This approach substitutes evidence-based due diligence with generalised association.**

Effective ITSCI incident management system and control measures

Given the heightened risks in Eastern DRC, **ITSCI has taken concrete and risk-based actions on the ground.** All Rwandan exporters mentioned by Global Witness have been subject to close scrutiny and follow-up by ITSCI:

- Four exporters listed by Global Witness were suspended from the ITSCI Programme in 2025 or 2026. A fifth exporter, not mentioned in the Global Witness report, was also suspended in 2026. Global Witness notes that, following suspension, three exporters switched to another programme.
- High-level incidents have been opened against three additional exporters, and we have issued official letters to those entities. Another exporter, not listed by Global Witness, is also subject to a high-level incident. We continue to evaluate the information and evidence available and the companies’ responses.

² <https://www.responsiblemineralsinitiative.org/news/rmi-coltan-statement/>

³ Multiple updates on the security situation in Eastern DRC and impact on the ITSCI Programme have been published on the ITSCI website throughout 2024-2025: <https://www.itsci.org/news/news/>

We emphasise that **suspensions must be based on evidence of due diligence failure**. These actions show **ITSCI’s proactive, reactive and good faith efforts to strengthen controls using a risk-based approach**.

Strict tag controls are in place at ITSCI-monitored sites. Rwandan state agents do not receive unlimited quantities of ITSCI tags. Tags are distributed every two weeks based on plausibility assessments at the mines of origin. Information received by ITSCI suggests that non-ITSCI tags may be available in unlimited amounts.

As with any control system, issues related to plausibility, including misuse of tags, remain possible and are addressed through incident reporting, investigation and follow-up. In 2025, 184 incidents were reported by ITSCI on such issues, including 44 level 1 (high risk) incidents, resulting in alerts shared with ITSCI participating companies.

Fostering data transparency

The Global Witness report’s comparison with 2020 is misleading. 2020 is not an appropriate baseline because at that time, COVID significantly disrupted and reduced mining and trade activities in Rwanda and elsewhere.

In two recent ITSCI statements on tantalum trade⁴, we confirmed that;

- In 2025 the volume of Rwandan coltan exports traced through ITSCI reached 2,038 tonnes, marking a 13% variation (-316 tonnes) compared with 2024.
- There was a difference of 1,226 tonnes between the tantalum export volumes recorded in the ITSCI Programme in 2025 (2,038 tonnes) and the world tantalum import volumes from Rwanda (3,264 tonnes).

The above demonstrate that **ITSCI-traced coltan exports from Rwanda do not represent the entirety of exports from Rwanda. In 2025, the majority of cassiterite and wolframite exports were traced by non-ITSCI systems**. Overall, it is therefore inaccurate to consider ITSCI as the “dominant system” in Rwanda.

Supporting transparency and consistent accountability

We welcome the fact that the supply chain transparency ITSCI has built over the past 15 years is being used, including by Global Witness, to highlight risks and incidents on the ground. This reflects the strength of the ITSCI incident reporting mechanism.

That said, it is disappointing to see this transparency leveraged in a manner that appears disproportionately focused on ITSCI itself, rather than supporting a fair and unbiased scrutiny of responsibilities across the sector, including all due diligence systems, whether company-led or third-party.

The Global Witness report applies more definitive language to ITSCI than to other actors when making allegations, many of which are recycled from outdated or historical reports. By contrast, the language used for other actors cited by Global Witness is more cautious and nuanced. A more balanced approach would better support accountability across the sector and encourage effective risk mitigation rather than selective attribution of blame.

⁴ <https://www.itsci.org/2026/02/11/updated-itsci-statement-shifts-in-tantalum-mineral-flows-from-the-great-lakes-region/>
<https://www.itsci.org/2025/11/12/itsci-statement-shifts-in-tantalum-mineral-flows-from-the-great-lakes-region/>

Selective use of sources, repeated claims, inaccurate statements

We note that the Global Witness report relies heavily on its 2022 *Laundromat* report, which was itself based in part on historical information from the early 2010s. This raises questions about the extent to which this new report is based on fresh investigations, as well as the relevance of some of the issues repeated. The report appears to rely on a limited pool of new documentation to support broad claims about the entire supply chain, while its historical arguments seem to rest largely on re-citing past allegations rather than on new fieldwork or fresh evidence. This is further illustrated by the fact that a large number of sources cited in the report pre-date 2024. **We also regret that, despite relying extensively on the 2022 report, Global Witness makes no reference to ITSCI’s detailed response published at the time.**⁵

Global Witness further recommends ITSCI to set up a multistakeholder governance structure, unfortunately failing to acknowledge the recent changes implemented by ITSCI. Since 1st May 2026, the ITSCI Programme is administered by an independent, stand-alone not-for-profit entity, The ITSCI Organisation.⁶

Concluding remarks

ITSCI supports evidence-based scrutiny and welcomes engagement on how due diligence systems can be strengthened without driving blanket disengagement from the region. We continue to advocate for OECD-aligned, consistent and transparent due diligence across the upstream mineral supply chain.

The Global Witness report represents a missed opportunity to advance constructive engagement and strengthen accountability across all actors in the 3T supply chain, from local companies to international organisations. Global Witness’ report suggests that due diligence systems have failed, thereby calling into question the OECD Guidance that it has previously supported and agreed to. It would be important to clarify whether Global Witness now considers the Guidance unfit for purpose, as the report appears to advance a generalisation that no meaningful progress has been made over the past 15 years, an implication that does not reflect the reality and evidence of substantial improvements achieved in the region.

We continue to advocate for constructive multi-stakeholder engagement to advance the shared objectives of responsible sourcing and to generate tangible and lasting benefits for mining communities.

We are committed to recording and following up on all information received regarding supply chain risks and encourages all parties to use our whistleblowing programme to report any risks or incidents, so that we can continue reporting concerns and advocating for appropriate actions. The ITSCI whistleblowing procedure and contact details are available online at www.itsci.org/contact/. The confidential ITSCI whistleblowing address is itsci.whistleblowing@itsci.org.

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⁵ <https://www.itsci.org/2022/06/28/itsci-response-to-global-witness-the-itsci-laundromat/>

⁶ <https://www.itsci.org/2026/05/04/a-new-chapter-for-the-itsci-programme/>