ZAMBIA'S 3 MILLION METRIC TONNES OF COPPER TARGET: MITIGATING GOVERNANCE RISKS ASSOCIATED WITH CHINESE MINING

Since 2016, Transparency International's Accountable Mining Programme has worked across the Transparency International (TI) global network to look at where and how corruption can affect mining governance. The Accountable Mining Programme Global Team, based in Melbourne, is a core resource on mining sector accountability. We work collaboratively with governments, companies, civil society organisations and communities in more than 20 countries, to ensure mining sector governance is transparent, accountable and participatory, promotes gender equality and protects the social and environmental interests of current and future generations.

http://mining.transparency.org.au

Cover: iStockphoto. Two production drills complete a blast pattern while spotters look on at an open-pit copper mine in Zambia.

Author: Transparency International Zambia

Acknowledgements: Transparency International Zambia thanks the Ministry of Mines and Minerals Development, local authorities, Chinese mining companies, law enforcement agencies, community representatives, media houses and journalists that participated in this study. TI Zambia also thanks Mr. Bright Chizonde and Ms. Tamika Halwiindi for conducting the study and Ms. Bwalya Nonde for providing research and logistical support. We also thank the panel of experts from academia and civil society organisations that peer-reviewed both the research tools and the final report. The study would also not have been possible without the technical support of the Transparency International Accountable Mining Programme and the senior management team of Transparency International Zambia.

Transparency International Australia is the national chapter of Transparency International, a global coalition against corruption operating in over 100 countries. Each chapter is independent and unique, and together we aspire to a unified vision: a world free of corruption. The Accountable Mining Programme Global Team, based in Melbourne, is a core resource on mining sector accountability.

Transparency International Australia acknowledges the Wurundjeri Woi Wurrung people of the Kulin Nation, the Traditional Owners of the land on which our Melbourne office stands. We pay our respects to Elders, past and present.

PO Box 13276, Law Courts VIC 8010, Australia.

CONTENTS

1 EXECUTIVE SUMMARY

Zambia is the second largest producer of copper in Africa,[1] producing about 890,346 metric tonnes of copper in 2025, up from 825,513 tonnes the previous year.[2] Zambia's 2025 target to increase copper production to 1 million metric tonnes, although not achieved, is part of a broader goal to reach 3 million metric tonnes by 2031.[3] In implementing this strategy, Zambia plans to increase investment in the mining sector and copper mining sub-sector. Following Zambia's President, Mr. Hakainde Hichilema's, investment promotion visit to China, Zambia forged a "comprehensive strategic and cooperative partnership" with China to unlock its full mineral potential and drive sustainable growth.[4]

This study critically assessed the governance risk associated with increased Chinese mining investments in Zambia's copper mining sub-sector. Using the framework of the Mining Awards Corruption Risk Assessment (MACRA) Tool,[5] developed by Transparency International's Accountable Mining Programme, and the Initiative for Responsible Mining Assurance (IRMA) Standard,[6] the study examined the institutional, environmental and socio-political risks of increased Chinese mining investments in Zambia. The corruption risk assessment employed a qualitative case study and participatory approach to investigate governance risks in Zambia's copper mining sub-sector, with a particular focus on Chinese investments. By focusing on Zambia's drive to expand copper production to 3 million metric tonnes, the study sought to identify the most significant governance risks associated with mining sector expansion.

The study identified several Chinese investments in the mining and critical minerals sub-sector. Four out of the 14 large-scale mining projects are Chinese-owned and accounted for 25% of the government revenue from the sector in 2025. These include Chambishi Copper Smelter LTD (CCS), CNMC-Luanshya Copper Mines PLC, Non-Ferrous Company Africa Mining Plc (NFCA) and Lubambe Copper Mine LTD. It was, however, also notable that the Zambian state-owned Zambia Consolidated Copper Mines Investments Holdings (ZCCM-IH) has a minority stake in most of these large-scale Chinese-owned mines, reflecting Zambia's ambition to ensure some ownership of its mineral resources, in addition to a strong partnership between Zambia and China in the mining sector.

The policy, legal and regulatory framework governing the critical minerals mining sub-sector in Zambia was found to be inadequate as it is ineffective in enforcing robust, responsible and ethical extraction. Consequently, the sector has several policy and regulatory challenges, including a failure to maximise benefits from mining, incidences of environmental pollution and limited worker safety, weak regulatory enforcement by state institutions, land administration challenges and community displacements. The major governance and corruption risks associated with Chinese mining included the fronting of citizens in land acquisitions, especially agricultural land to accommodate mining development; political interference and regulatory capture, enabled by procurement opacity; and bribery during inspections and pollution monitoring. The study also found evidence of information suppression and undue media influence through restricting access to host communities and advertisement expenditure, respectively.

1 Transparency International Australia (2024). Digging Deeper: Understanding the Global Chinese Mining Sector. https://transparency.org.au/wp-content/uploads/2024/11/Digging-Deeper_Global-Chinese-Mining-Sector_2024.pdf

2 Reuters (2026) Zambia says 2025 copper production up 8% from previous year, CNBC Africa, 27 January. Available at: https://www.cnbcafrica.com/2026/zambia-says-2025-copper-production-up-8-from-previous-year (accessed 29 June 2026).

3 Ministry of Mines and Mineral Development (MMMD). (2024, September 12). Three Million Tonnes Copper Production Strategy by 2031. Government of the Republic of Zambia. Retrieved from https://www.mmmd.gov.zm/?p=3161

4 Ministry of Mines and Minerals Development (MMMD), "Mines Minister Highlights Strong China-Zambia Partnership at Invest in Zambia International Conference 2025," 18 July 2025, https://www.mmmd.gov.zm/?p=5466

5 Transparency International Australia. (n.d.). MACRA Tool (Mining Awards Corruption Risk Assessment Tool). Available at: https://mining.transparency.org.au/macra-tool/ (Accessed: 30 June 2026).

6 Initiative for Responsible Mining Assurance (IRMA). (n.d.). IRMA Standard for Responsible Mining. Available at: https://responsiblemining.net/what-we-do/standard/irma-mining-standard/ (Accessed: 30 June 2026).

Recommendation 1: Strengthen the policy, legal and regulatory framework to enhance adherence to responsible mining practices and ethical extraction.

- Review the National Three (3) Million Tonnes Copper Production Strategy (NTMTS) to integrate priority interventions and objectives on mitigating environmental and social risks associated with increased production. Even though the National Critical Minerals Strategy (2024–2028) has an intervention on enhancing environmental, social and governance frameworks in the critical minerals value chain, the NTMTS is prominently focused on increased production, with little consideration for the potential environmental impact of higher production, given the limited adherence to ESG standards in the sector.
- Enhance coordination, implementation, and enforcement of laws governing mining and land administration, particularly where mining rights overlap with surface rights. This will contribute to transparent and inclusive negotiations and decision-making processes, ensuring that traditional leaders, communities, and other key actors have a voice in land allocation and mining governance.[7]
- Maintain a stable and predictable mining fiscal regime to attract more investment while maximising the contribution of the sector to government revenue. The Zambia EITI notes that the country has repeatedly altered its mining fiscal regime, creating ongoing debate regarding the need for a more stable and predictable legal framework to balance investment attraction and revenue generation.[8]

Recommendation 2: Strengthen the enforcement capacity of public entities and monitor corruption preventive measures.

- Develop a sector-specific anti-corruption strategy and enhance the implementation of sector-specific preventive measures. Notably, the Anti-Corruption Commission (ACC), has limited customised measures aimed at mitigating corruption risks in the mining sector. There is a need to complement the Integrity Committee at the Ministry of Mines and Minerals Development, improve collaboration with the ACC, and establish another integrity committee at the Minerals Regulation Commission.
- Increase funding commensurate with mining production ambition to the local authorities in mining areas, ZEMA and the Mineral Regulation Commission (MRC) to address institutional incapacities including transportation, staffing and equipment, as well as preventing environmental disasters.
- Improve coordination among enforcement agencies, including ZEMA, local authorities and the MRC, to ensure that mining companies are not overwhelmed by enforcement recommendations. The issuing of uncoordinated recommendations reinforces the need for Chinese mining companies to maintain political relationships with PEPs.
- Ensure comprehensive onboarding of Chinese investors to ensure that they have a good understanding of the regulatory frameworks and laws as well as the process of mining-related approvals with the different public entities. Stakeholders noted that the high risk of bribery was due to limited understanding of the processes and timelines for approvals.

Recommendation 3: Mitigate political interference through declaration of interest and promoting transparency in procurement processes.

- Enact a comprehensive law to mandate the effective declaration of interest and periodic declaration of assets and liabilities for all senior public officials. Although the Parliamentary and Ministerial Code of Conduct Act No. 35 of 1994 establishes the code of conduct, including provisions on integrity, disclosure of interests, assets, liabilities, and ethical conduct in public office, it excludes most senior public officials.
- Accelerate the review of the Anti-Corruption Act to expand coverage of the offence of abuse of public office. The current Act excludes state officers (i.e. the President, Vice-President, Speaker, Deputy Speaker, Member of Parliament, Minister and Provincial Minister), councillors, constitutional office holders (i.e. the Secretary to Cabinet, Attorney-General, Solicitor-General, Director of Public Prosecutions, Secretary to Treasury, and permanent secretaries), judges and judicial officers.

7 Centre for Environment Justice. (2024). Critical minerals and land use governance in Zambia (CMLUZ): 2024. https://cejzambia.org/2024-critical-minerals-and-land-use-governance-in-zambia/

8 Extractive Industries Transparency Initiative (EITI) (n.d.) Zambia. Available at: https://eiti.org/countries/zambia (Accessed: 28 July 2026)

Recommendation 4: Enhance media freedom and transparency during mining pollution incidents.

- Ensure press and media freedom during mining-related pollution incidents to promote objective reporting. The media have a right to information, which should be protected during public health, worker safety and pollution incidents. The respective mining company and government should coordinate with the media and journalists to allow safe access to affected communities, rather than imposing unreasonable restrictions, as this escalates suspicion of wrongdoing and underhandedness.
- Ensure timely disclosure of accurate information from the government (ZEMA, Ministry of Green Economy and Environment, as well as respective mining companies). Timely disclosure will promote public trust and ensure that the duty bearers are effectively redressing public and environmental concerns.

2 INTRODUCTION

As the world intensifies its efforts to achieve the net-zero emissions target by 2050,[9] there has been a shift from traditional fuel-intensive to mineral-intensive energy systems.[10] In this energy transition, copper has been rightly described as the "metal of electrification" because renewable technologies such as solar panels and electric vehicles (EVs), as well as supporting infrastructure, are significantly more copper intensive than conventional systems.[11] This essential role of copper has also created a global supply shortfall. While copper demand is projected to grow from 25 million metric tonnes in 2022 to about 50 million metric tonnes by 2035,[12] global supply is not expected to keep pace. Copper demand is projected to exceed supply by up to 9.9 million metric tonnes in 2035, or about 20 per cent less than the required supply for the net-zero emissions target.[13] Other estimates indicate that global copper demand will grow by over 40 per cent by 2040 and that meeting this rising demand may require 80 new mines and US $250 billion in new investments by 2030.[14]

The investment in new mines and expansion is likely to be concentrated in a few selected countries. This is because over 50 per cent of global copper reserves are located in just five countries. These are Chile, which accounts for about 20 per cent, Australia, Peru, the Democratic Republic of the Congo and the Russian Federation.[15] Furthermore, it is even more likely that countries with industrial capacity will benefit more from the energy transition than the source countries. Even though it is widely understood that raw copper yields limited returns, most major copper exporters have limited capacity for industrial upgrading. Therefore, countries like China, which is the world's largest producer and consumer of mineral commodities, will generate greater returns through value addition. In 2025, China imported about 60 per cent of global copper ore and produced more than 45 per cent of the world's refined copper.[16]

In addition to its industrial dominance, China is a player in global mining, targeting copper and other critical minerals such as lithium, nickel, and cobalt.[17] Since 2018, China has invested over US$60 billion in the overseas metals sector (approximately 16 per cent of its total overseas investment).[18] Transparency International's Accountable Mining Programme identified 81 Chinese mining companies involved in 180 projects globally.[19] These included 4 Chinese-owned critical minerals projects in Chile, 19 projects in DRC, 16 in Indonesia and 6 projects in Zambia.[20] **Figure 1** presents the distribution of Chinese-owned critical minerals projects in some of the world's top copper-producing countries.

In Africa, the Democratic Republic of the Congo (DRC) is the largest producer of copper, followed by Zambia.[21] In 2023, the DRC and Zambia accounted for nearly 94.4 per cent of Africa's total copper output and contributed approximately 15 per cent of the global copper supply.[22] In terms of country-specific output, Zambia

---

9 International Energy Agency (IEA) (2025) World Energy Outlook 2025: Net Zero Emissions by 2050. Available at: https://www.iea.org/reports/world-energy-outlook-2025/net-zero-emissions-by-2050 (Accessed: 29 June 2026).

10 S&P Global (2022) The Future of Copper: Will the looming supply gap short-circuit the energy transition? Available at: https://cdn.ihsmarkit.com/www/pdf/0722/The-Future-of-Copper_Full-Report_14July2022.pdf (Accessed: 29 June 2026).

11 Ibid.

12 Ibid.

13 Ibid.

14 UNCTAD (2025) Global Trade Update (May 2025): Focus on critical minerals – copper in the new green and digital economy. Available at: https://unctad.org/publication/global-trade-update-may-2025-critical-minerals-copper (accessed 29 June 2026)

15 ibid.

16 ibid.

17 United Nations Environment Programme (UNEP), Critical Energy Transition Minerals, available at: https://www.unep.org/topics/energy/renewable-energy/critical-energy-transition-minerals (accessed 29 June 2026)

18 American Enterprise Institute (AEI) (n.d.) China Global Investment Tracker. Available at: https://www.aei.org/china-global-investment-tracker/ (accessed 29 June 2026).

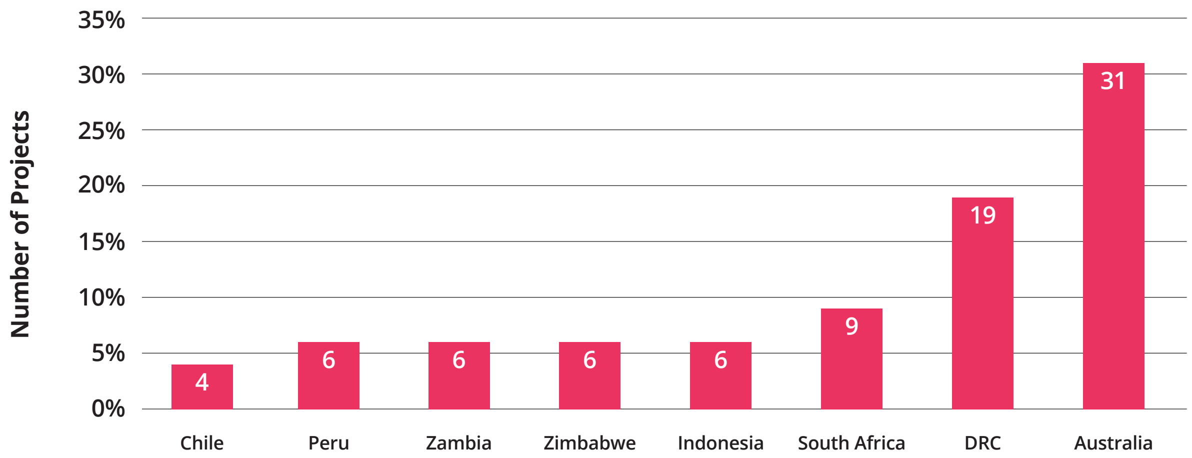
19 Transparency International Australia (2024). Digging Deeper: Understanding the Global Chinese Mining Sector. https://transparency.org.au/wp-content/uploads/2024/11/Digging-Deeper_Global-Chinese-Mining-Sector_2024.pdf

20 Ibid.

21 Ibid.

22 African Development Bank (AfDB) (2024) Critical Mineral Insights: Copper (Factsheet 3). Available at: https://www.afdb.org/sites/default/files/documents/publications/copper_factsheet_3.pdf (accessed 29 June 2026)

Figure 1: Chinese-owned critical minerals projects in top copper-producing countries



Source: Transparency International Accountable Mining Programme (2024)
Transparency International Australia (2024). Digging Deeper: Understanding the Global Chinese Mining Sector

produced about 890,346 metric tonnes of copper in 2025, up from 825,513 metric tonnes the previous year, short of its 1 million tonnes target.[23] This was compared to DRC's 2025 copper production of 3.5 million metric tonnes.[24] Therefore, China's investment in the DRC and Zambia is strategic, as the DRC is also the world's largest producer of cobalt, while Zambia has higher-grade copper deposits.[25]

Zambia's 2025 target to increase copper production to 1 million metric tonnes is part of a broader goal to reach 3 million metric tonnes by 2031.[26] According to the Ministry of Mines and Minerals Development, the strategy was developed on the premise of various emerging global opportunities, such as the green energy transition from fossil fuels, as copper is a critical input material.[27] In implementing the strategy, Zambia seeks to increase investments in the mining sector and copper mining sub-sector. Following Zambia's President Mr. Hakainde Hichilema's investment promotion visit to China, Zambia forged a "comprehensive strategic and cooperative partnership" with China to unlock its full mineral potential and drive sustainable growth.[28]

This study critically assessed the governance risks associated with increased Chinese mining investments in Zambia's copper mining sub-sector. Using the framework of the Mining Awards Corruption Risk Assessment (MACRA) Tool,[29] developed by the Transparency International Accountable Mining Programme, and the Initiative for Responsible Mining Assurance (IRMA) Standard,[30] the study examined the institutional, environmental and socio-political risks of increased Chinese mining investments in Zambia. It assessed these risks within Zambia's mining sector's political economy, reflecting on their implications for the transparency and accountability discourse in the extractive sector. Through a rigorous analysis of governance structures, stakeholder interactions, and regulatory practices, the study sought to provide concrete, policy-oriented recommendations to support the advocacy efforts of civil society organisations.

23 Reuters (2026) Zambia says 2025 copper production up 8% from previous year, CNBC Africa, 27 January. Available at: https://www.cnbcafrica.com/2026/zambia-says-2025-copper-production-up-8-from-previous-year (accessed 29 June 2026).

24 Ben McGregor, Zambia vs DRC: A Comparison of Copper Mining Giants, Canadian Mining Report, 2 May 2026, available at: https://www.canadianminingreport.com/blog/zambia-vs-drc-a-comparison-of-copper-mining-giants (accessed 29 June 2026)

25 See National Minerals Information Center (2024) U.S. Geological Survey Mineral Commodity Summaries 2024 Data Release (ver. 2.0, March 2024): U.S. Geological Survey data release, https://doi.org/10.5066/P144BA54. Note: TIA derived this figure using data from the U.S. Geological Survey.

26 Ministry of Mines and Mineral Development (MMMD). (2024, September 12). Three Million Tonnes Copper Production Strategy by 2031. Government of the Republic of Zambia. Retrieved from https://www.mmmd.gov.zm/?p=3161

27 Ibid.

28 Ibid.

29 Transparency International Australia. (n.d.). MACRA Tool (Mining Awards Corruption Risk Assessment Tool). Available at: https://mining.transparency.org.au/macra-tool/ (Accessed: 30 June 2026).

30 Initiative for Responsible Mining Assurance (IRMA). (n.d.). IRMA Standard for Responsible Mining. Available at: https://responsiblemining.net/what-we-do/standard/irma-mining-standard/ (Accessed: 30 June 2026).

The corruption risk assessment employs a qualitative case study and participatory approach to investigate governance risks in Zambia's copper mining sub-sector, with a particular focus on Chinese investments. By focusing on Zambia's drive to expand copper production to 3 million metric tonnes, the study sought to identify the most significant governance risks during mining sector expansion. The data collection involved a multi-method strategy. Firstly, a comprehensive review of laws, regulations, policies and regulatory frameworks, as well as reports and media articles, was conducted. This desk-based research also documented the significance of Chinese mining in Zambia, including its contribution to employment and output, as well as notable media reports on pollution and other failures in adherence to licence and environmental, social, and governance (ESG) standards.

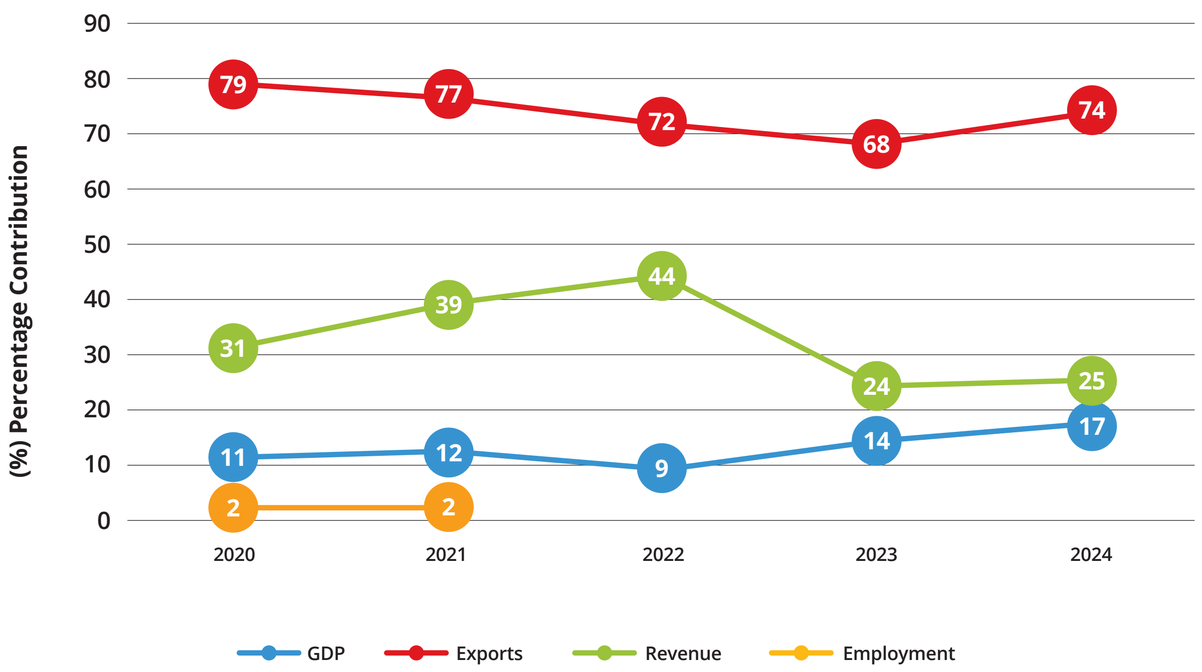
Secondly, following the desk-based research, a stakeholder roundtable discussion was held with eight mining sector experts from government, academia, and civil society to identify potential sources of information, define the research scope, and review the data collection tools. Thereafter, 2 focus group discussions were held with 12 journalists specialised in environmental and mining sector reporting, and 12 community members and community-based organisations. Furthermore, five semi-structured interviews were also conducted with purposively selected key informants, including government officials and representatives of mining companies. These key informant interviews (KIIs) and focus group discussions provided a diverse perspective on regulatory enforcement, community impacts, and governance challenges.

3 AN OVERVIEW OF ZAMBIA'S EXTRACTIVE SECTOR

3.1 CONTRIBUTION TO THE ECONOMY

Over the past 100 years, the extractive sector has shaped Zambia's development trajectory and economy.[31] In 2024, the extractive sector accounted for 17 per cent of Gross Domestic Product (GDP) and contributed 25 per cent of government revenues through various taxes and fees.[32] Furthermore, the sector also accounted for 74 per cent of the country's total exports in 2024, up from 68 per cent in 2023.[33] **Figure 2** presents a summary of the extractive sector's contribution to Zambia's economy.

Figure 2: Contribution of Zambia's extractive sector to the economy



Source: Zambia EITI Reports, 2020–2024

31 International Growth Centre (2019). The current state of artisanal and small-scale mining in Zambia. Accessed: https://www.theigc.org/blogs/current-state-artisanal-and-small-scale-mining-zambia

32 Zambia Extractive Industries Transparency Initiative (ZEITI) Report for the period 2023 to 2024. Accessed: https://zambiaeiti.org/wp-content/uploads/2025/10/Zambia-EITI-2023-and-2024-report.pdf

33 ibid.

Notably, the extractive sector's contribution to exports declined from 79 per cent in 2020 to 68 per cent in 2023, while its contribution to government revenue fell significantly from 44 per cent in 2022 to 23 per cent in 2024. This period corresponds to the post-COVID decline in copper production from 837,003.6 metric tonnes in 2020 to 736,585 metric tonnes in 2023.[34] **Table 1** presents the mineral production volumes from 2020 to 2024.

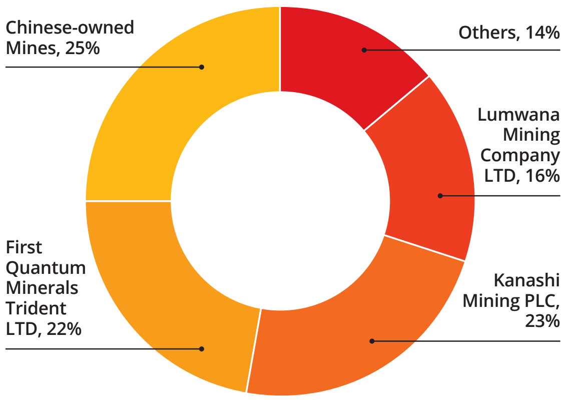
Table 1: Zambia's Selected Mineral Production Volumes: 2020 to 2024[36]

Mineral	2020	2021	2022	2023	2024
Copper (Metric tonnes)	837,003.6	803,746	763,550	736,585	822,824
Cobalt (Metric tonnes)	316	249	251	1,507	1,410
Manganese (Metric tonnes)	28.409	132,240	158,675	171,066	134,933

Source: Zambia EITI Reports, 2020–2024

Despite the severe electricity shortage experienced in 2024,[36] copper production increased to 822,824 metric tonnes in 2024, driven by higher output from major mines such as Lumwana Mining Company LTD, as well as the resumption of operations at Konkola Copper Mines PLC and Mopani Copper Mines PLC.[37] In 2024, Kansanshi Mining PLC made the largest contribution to government revenue, paying taxes in excess of US$284 million, and was closely followed by First Quantum Minerals Trident LTD (US$281.8 million) and Lumwana Mining Company LTD (US$204 million). These three revenue contributions accounted for over 61 per cent of the total annual government revenue from the extractive sector in 2024.[38] In addition, **Figure 3** indicates that four large-scale Chinese-owned mining companies jointly contributed approximately 25 per cent to government revenue in the sector.[39]

Figure 3: Contribution of Mining Companies to GRZ Extractive Sector Revenue, 2024.



34 Zambia Extractive Industries Transparency Initiative (ZEITI) Report for the period 2023 to 2024. Accessed: https://zambiaeiti.org/wp-content/uploads/2025/10/Zambia-EITI-2023-and-2024-report.pdf

35 Zambia Extractive Industries Transparency Initiative (ZEITI) Report for the period 2023 to 2024. Accessed: https://zambiaeiti.org/wp-content/uploads/2025/10/Zambia-EITI-2023-and-2024-report.pdf and Ministry of Mines and Minerals Development

36 Chibwili, E. (2026) AD1178: Amid electricity crisis, Zambians favour ending state monopoly, investing in solar and wind power. Afrobarometer Dispatch No. 1178. Afrobarometer, 7 May. Available at: https://www.afrobarometer.org/publication/ad1178-amid-electricity-crisis-zambians-favour-ending-state-monopoly-investing-in-solar-and-wind-power/ (Accessed: 2 July 2026).

37 PwC Zambia (2026) Zambia 2025 Mining Report. 4th edn. Lusaka: PwC Zambia. Published 13 January 2026. Available at: https://www.pwc.com/zm/en/publications/zambia-mining-report.html (Accessed: 2 July 2026)

38 Zambia Extractive Industries Transparency Initiative (ZEITI) (2026) EITI Summary Data: Zambia 2024. Available at: https://zambiaeiti.org/wp-content/uploads/2026/06/EITI-Summary-Data-Zambia-2024-1.xlsx (Accessed: 2 July 2026)

39 ibid.

3.2 LEVEL OF CHINESE AND ZAMBIAN GOVERNMENT OWNERSHIP

The 2023–2024 Zambia EITI Report included 13 large-scale mining projects in Zambia that made significant contributions to government revenue and/or held some government ownership.[40] Of these 13 mining projects, seven were Chinese owned, including Chambishi Copper Smelter LTD (CCS), a holding subsidiary of China Nonferrous Metal Mining (Group) Co. LTD. (CNMC),[41] a Chinese state enterprise that also held an 80 per cent stake in both CNMC-Luanshya Copper Mines PLC[42] and Non-Ferrous Company Africa Mining Plc (NFCA).[43] The other Chinese-owned mining company included in the Zambia EITI report was Lubambe Copper Mine LTD, which was majority-owned by China's JCHX Mining Management Group.[44] In addition, Chibuluma Mines PLC was majority-owned by Jinchuan Group Company Limited, another Chinese state-controlled conglomerate.[45]

The study also found that the Zambian state-owned Zambia Consolidated Copper Mines Investments Holdings (ZCCM-IH) held minority stakes in most of these large-scale Chinese-owned mines, reflecting Zambia's ambition to ensure some ownership of its mineral resources, as well as a strong partnership between Zambia and China in the mining sector.[46] ZCCM-IH is an investment holding company owned by the Zambian Government through a 60.3 per cent stake held by the Industrial Development Corporation (IDC), a 17.3 per cent Stake held by the Ministry of Finance and National Planning and another 15% stake held by the National Pensions Scheme Authority (NAPSA).[47] **Table 2** presents the distribution of ownership structure among some ZCCM-IH and Chinese majority-owned mining companies in Zambia.

Table 2: Zambian Government and Chinese-owned mines in Zambia

Mining Company/ Project	Minerals	Chinese-ownership	Zambian Government ownership
Chibuluma Mines PLC	Copper	**85%:** Jinchuan Group Company LTD	**15%:** Zambia Consolidated Copper Mines Investments Holdings (ZCCM-IH)
Chambishi Copper Smelter LTD (CCS) and Sino-Metals Leach Zambia LTD	Copper and Cobalt	Subsidiaries of China Nonferrous Metal Mining (Group) Co. LTD. (CNMC)	**None**
Chambishi Metals PC	Cobalt and copper	**None**	**10%:** Zambia Consolidated Copper Mines Investments Holdings (ZCCM-IH)
CNMC-Luanshya Copper Mines PLC	Silver, Gold, Bismuth, Cobalt, Copper, Nickel, Lead, Uranium, Zinc	**80%:** China Nonferrous Metal Mining (Group) Co. LTD. (CNMC)	**20%:** Zambia Consolidated Copper Mines Investments Holdings (ZCCM-IH)
Non-Ferrous Company Africa Mining PLC (NFCA)	Copper	**80%:** China Nonferrous Metal Mining (Group) Co. LTD. (CNMC)	**15%:** Zambia Consolidated Copper Mines Investments Holdings (ZCCM-IH)
Lubambe Copper Mine LTD	Copper	**70%:** China's JCHX Mining Management Group.	**30%:** Zambia Consolidated Copper Mines Investments Holdings (ZCCM-IH)

Source: Jinchuan Group, CNMC, ZCCM-IH Websites and Z EITI Statistics.

The study found that although the Zambian Government consistently received dividend payments from ZCCM-IH through these shareholding public entities,[48] most of the payouts were linked to other mining companies and assets.[49] Chinese majority-owned mining companies such as NFC Africa Mining PLC, for instance, were not consistently paying out dividends to their shareholders.[50 51 52]

3.3 THE 3 MILLION METRIC TONNES COPPER PRODUCTION STRATEGY AND SURGE IN CHINESE INVESTMENTS

The Zambian government developed the National 3-Million Metric Tonnes Copper Production Strategy[53] to increase copper production to 3 million metric tonnes by 2031, up from a baseline of about 800,000 metric tonnes. The strategy seeks to stimulate investment in mineral resource exploration, mining, processing, and supply of goods and services. Furthermore, as part of the strategy, Zambia plans to conduct countrywide high-resolution aerial geophysical surveys to enhance geological information.[54] The strategy is also consistent with Zambia's Eighth National Development Plan (2022–2026),[55] the National Mineral Resources Development Policy (2022–2027),[56] and the Mines and Minerals Development Strategic Plan (2022–2026).[57] Additionally, the Zambian government developed a National Critical Minerals Strategy in 2024,[58] which outlines pathways to further encourage strategic investment in critical minerals along the entire value chain.

40 According to the 2023-2025, mining companies included contributed at least 2 percent to government revenue and/or had come level of government ownership. See Zambia Extractive Industries Transparency Initiative (ZEITI) (2025) Zambia EITI 2023 and 2024 Report. Lusaka: Zambia Extractive Industries Transparency Initiative. Available at: https://zambiaeiti.org/wp-content/uploads/2025/10/Zambia-EITI-2023-and-2024-report.pdf (Accessed: 4 July 2026).

41 China Nonferrous Mining Corporation Limited (n.d.) Company Profile. Available at: https://cnmcl.net/en/about-us/company-profile/ (Accessed: 4 July 2026).

42 ZCCM Investments Holdings Plc (n.d.) CNMC Luanshya Copper Mines Plc. Available at: https://www.zccm-ih.com.zm/investments/mining-assets/cnmc-luanshya-copper-mines-plc/ (Accessed: 4 July 2026).

43 ZCCM Investments Holdings Plc (n.d.) NFC Africa Mining Plc. Available at: https://www.zccm-ih.com.zm/investments/mining-assets/nfc-africa-plc/ (Accessed: 4 July 2026).

44 ZCCM Investments Holdings Plc (n.d.) Lubambe Copper Mines Plc. Available at: https://www.zccm-ih.com.zm/investments/mining-assets/lubambe-copper-mines-plc/ (Accessed: 4 July 2026).

45 Jinchuan Group Co., Ltd. (2026) The Profile of Jinchuan Group Co., Ltd. Updated 23 April. Available at: https://en.jnmc.com/2026-04/23/c_973987.htm (Accessed: 4 July 2026)

46 ZCCM Investments Holdings Plc (2026) ZCCM-IH FY 2025 provisional abridged unaudited financial results. Lusaka: ZCCM Investments Holdings Plc. Available at: https://zccm-ih.financifi.com/download/zccm-ih-fy-2025-provisional-abridged-unaudited-financial-results-2/ (Accessed: 4 July 2026).

47 ZCCM Investments Holdings Plc (ZCCM-IH). 2021. Top Shareholders. Available at: https://zccm-ih.financifi.com/overview/top-shareholders/ (Accessed: 5 July 2026).

48 ZCCM Investments Holdings Plc (ZCCM-IH). 2025. ZCCM-IH Shareholders Receive Dividend Cheques. 14 August 2025. Available at: https://www.zccm-ih.com.zm/2025/08/14/zccm-ih-shareholders-receive-dividend-cheques/ (Accessed: 5 July 2026)

49 ZCCM Investments Holdings Plc (ZCCM-IH). 2024. ZCCM-IH Shareholders in ZMW243 Million Dividend Payout as the Company Records a ZMW4.8 Billion in Company Profit. 8 July 2024. Available at: https://www.zccm-ih.com.zm/2024/07/08/zccm-ih-shareholders-in-zmw243-million-dividend-payout-as-the-company-recordsa-zmw4-8-billion-in-company-profit-2/ (Accessed: 5 July 2026)

50 ZCCM Investments Holdings Plc (ZCCM-IH). 2021. NFC Africa Mining Plc (NFCA) Extract from 2021 Annual Report. 26 November 2021. Available at: https://www.zccm-ih.com.zm/2021/11/26/nfc-africa-mining-plc-nfca-extract-from-2021-annual-report/ (Accessed: 5 July 2026).

51 ZCCM Investments Holdings Plc (ZCCM-IH). 2023. NFC Africa Mining Plc (NFCA) Extract from 2023 Annual Report. 8 June 2023. Available at: https://www.zccm-ih.com.zm/2023/06/08/nfc-africa-mining-plc-nfca-extract-from-2023-annual-report/ (Accessed: 5 July 2026).

52 ZCCM Investments Holdings Plc (ZCCM-IH). 2022. NFC Africa Mining Plc (NFCA) Extract from 2022 Annual Report. 15 December 2022. Available at: https://www.zccm-ih.com.zm/2022/12/15/nfc-africa-mining-plc-nfca-extract-from-2022-annual-report/ (Accessed: 5 July 2026).

53 Republic of Zambia. Ministry of Mines and Minerals Development. National Three Million Tonnes Copper Production Strategy by 2031. Published July 2024. Accessed: https://www.mmmd.gov.zm/wp-content/uploads/2024/08/2-National-Three-3-Millions-Tonnes-Copper-Production-Booklet-August-27-204.pdf

54 Ibid.

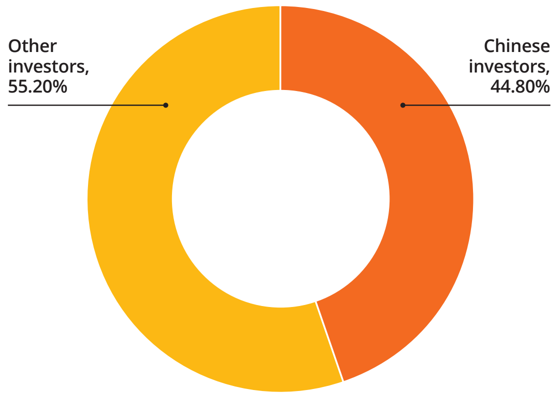
55 Republic of Zambia, Ministry of Finance and National Planning. 2022. Eighth National Development Plan (8NDP) 2022–2026: Socio-Economic Transformation for Improved Livelihoods. Lusaka: Ministry of Finance and National Planning. Available at: https://www.mofnp.gov.zm/?wpdmpro=8ndp-2022-2026 (Accessed: 5 July 2026).

56 Republic of Zambia, Ministry of Mines and Minerals Development. 2022. National Mineral Resources Development Policy 2022–2027. Lusaka: Ministry of Mines and Minerals Development. Available at: https://www.mmmd.gov.zm/wp-content/uploads/2024/09/National-Mineral-Resources-Development-Policy-2022.pdf (Accessed: 5 July 2026)

In an effort to realise the 3 million metric tonnes target, the Zambian government increased its efforts to attract foreign investment in the extractives sector. In 2024, the Ministry of Mines and Minerals Development reported that consolidated planned investments in the extractive industry were approximately US$9.3 billion.[59] Out of these investments, US$1.4 billion was associated with Chinese-owned mining companies and mining projects. These included the US$500 million invested by CNMC Luanshya Copper Mines PLC in the dewatering of Shaft 28, US$600 million invested in the Sino Kitumba Mine project, and a US$300 million investment commitment by China's JCHX Mining Management Group in Lubambe Copper Mine LTD.[60]

In addition, China also pledged to invest US$5 billion by 2031 to help Zambia reach 3 million metric tonnes of copper production through the Chinese Mining Enterprise Association in Zambia. The association plans to better coordinate investments and cooperation between Zambia and China.[61] **Figure 4** indicates that over 44 per cent of the mining sector investment commitments in Zambia were associated with Chinese mining companies and investors. These investments indicate increased investment interest from Chinese companies in countries with large reserves of critical minerals, including Zambia. Unfortunately, many resource-rich developing countries have weak governance frameworks, thereby leading to limited adherence to environmental, social, and governance (ESG) standards.[62]

Figure 4: Mining Sector Investment Commitments (Realised/Pledged), 2024–2031



3.4 LEGAL, REGULATORY AND INSTITUTIONAL FRAMEWORK

The legal framework for the critical minerals mining sub-sector in Zambia builds on the existing legal framework governing the mining sector in general. The framework includes the Geological and Minerals Development Act (2025) and the Minerals Regulation Commission Act (2024). These and other relevant laws are presented below:

57 Republic of Zambia, Ministry of Mines and Minerals Development. 2024. Ministry of Mines and Minerals Development Strategic Plan 2022–2026. Lusaka: Ministry of Mines and Minerals Development. Available at: https://www.mmmd.gov.zm/wp-content/uploads/2024/10/Strategic-Plan-2022-2026.pdf (Accessed: 5 July 2026).

58 Republic of Zambia. Ministry of Mines and Minerals Development. National Critical Minerals Strategy 2024–2028. Accessed: https://www.mmmd.gov.zm/wp-content/uploads/2024/09/1-National-Critical-Minerals-Strategy-2024-%E2%80%93-2028-Booklet-August-27-2024.pdf

59 Republic of Zambia, Ministry of Mines and Minerals Development. 2025. Media Statement by the Minister of Mines and Minerals Development Honourable Paul C. Kabuswe, MP at the Press Briefing on the Performance of the Mining Sector in 2024. Available at: https://www.mmmd.gov.zm/?p=3792 (Accessed: 5 July 2026).

60 Ministry of Mines and Minerals Development (MMMD),"Mines Minister Highlights Strong China-Zambia Partnership at Invest in Zambia International Conference 2025," 18 July 2025, https://www.mmmd.gov.zm/?p=5466

61 Doreen, N. 2024. New Chinese Mining Body to Invest $5 Billion in Zambia to Boost Copper Production. S&P Global Commodity Insights, 13 November 2024. Available at: https://www.spglobal.com/energy/en/news-research/latest-news/metals/111324-new-chinese-mining-body-to-invest-5-bil-in-zambia-to-boost-copper-production (Accessed: 5 July 2026)

62 Transparency International Australia (2024). Digging Deeper: Understanding the Global Chinese Mining Sector. https://transparency.org.au/wp-content/uploads/2024/11/Digging-Deeper_Global-Chinese-Mining-Sector_2024.pdf

63 The Minerals Regulation Commission Act, 2024. https://www.parliament.gov.zm/node/12085

64 Mines and Minerals Development Act No 11 of 2015. https://www.parliament.gov.zm/sites/default/files/documents/acts/The%20Mines%20and%20Minerals%20Act%2C%202015.pdf

1. Minerals Regulation Commission Act (2024)[63]

The Act repealed and replaced the Mines and Minerals Development Act No 11 of 2015[64] and is the primary legislation regulating the mining sector in Zambia. It provides for the regulation and monitoring of the development and management of mineral resources; establishes the Minerals Regulation Commission (MRC) and sets out its functions; and establishes the Mining Appeals Tribunal. The Act facilitated an important institutional framework reform to improve service delivery by the Ministry of Mines and Minerals Development through establishing the MRC.[65] As a consequence, all regulatory functions, including the mandate of the Mines Safety Department (MSD), were transferred to the MRC.[66] The Board of the MRC was inaugurated in May 2026,[67] and it has since begun operations following the recruitment of staff.[68]

2. Geological and Minerals Development Act (2025)[69]

The Act provides for the geological survey, mapping, and exploration, and for the establishment of the Artisanal and Small-Scale Mining Fund (ASMF). Some of the progressive provisions of the Act include establishing a department responsible for artisanal and small-scale mining and creating a fund to support the artisanal and small-scale mining subsector.[70] The ASMF was successfully launched in 2025.[71] The Act is primarily implemented by the Ministry of Mines and Minerals Development through its various departments, including the Mines Development Department and the Geological Survey Department.[72]

3. Local Content Statutory Instrument (2025)[73]

The Ministry of Mines and Minerals Development developed the Local Content Regulation for the mining sector to enhance the participation of Zambians across the mining value chain, through making provisions for mining companies to reserve contracts for Zambian contractors and suppliers.[74] However, its success is largely dependent on effective monitoring.[75] Therefore, the ministry recognises that achieving meaningful local content is a shared responsibility, requiring support from industry leaders, government agencies and active participation of local businesses.[76]

---

65 News Diggers (2025) Zambia's Mining Industry Policy Reforms: Perspectives from CTPD. Zambia: News Diggers!, 20 October 2025. Available at: https://diggers.news/guest-diggers/2025/10/20/zambias-mining-industry-policy-reforms-perspectives-from-ctpd/ (Accessed: 6 July 2026).

66 Mdala, H. (2025) Mining Series: The Role of the Minerals Regulation Commission in Zambia's Mining Sector. Chambers and Partners, 10 March 2025. Available at: https://chambers.com/articles/mining-series-the-role-of-the-minerals-regulation-commission-in-zambias-mining-sector (Accessed: 12 August 2026)

67 Africa Legal (2026)'Lifeline of the country' – Mining Minister inaugurates new Board for Zambia's Minerals Regulation Commission. 7 May 2026. Available at: https://www.africa-legal.com/news/lifeline-of-the-country-mining-minister-inaugurates-new-board-for-zambias-minerals-regulation-commission/ 127016 (Accessed: 6 July 2026).

68 Interview with the Ministry of Mines

69 Geological and Minerals Development Act (2025). https://www.parliament.gov.zm/node/12318

70 Republic of Zambia, Ministry of Mines and Minerals Development. 2025. Media Statement by the Minister of Mines and Minerals Development Honourable Paul C. Kabuswe, MP at the Press Briefing on the Performance of the Mining Sector in 2024. Available at: https://www.mmmd.gov.zm/?p=3792 (Accessed: 5 July 2026).

71 News Diggers (2025) Zambia's Mining Industry Policy Reforms: Perspectives from CTPD. Zambia: News Diggers!, 20 October 2025. Available at: https://diggers.news/guest-diggers/2025/10/20/zambias-mining-industry-policy-reforms-perspectives-from-ctpd/ (Accessed: 6 July 2026).

72 Ministry of Mines and Mineral Development (n.d.) Mines Development. Lusaka: Ministry of Mines and Mineral Development. Available at: https://www.mmmd.gov.zm/?page_id=1769 (Accessed: 6 July 2026).

73 The Geological and Minerals Development (Local Content) (Preference for Goods and Services in the Mining Sector) Regulations, 2025. https://www.mmmd.gov.zm/wp-content/uploads/2025/12/The-Geological-and-Minerals-Development-Preference-for-Zambian-Goods-and-Services-Regulations-2025.pdf

74 Republic of Zambia, Ministry of Mines and Minerals Development. 2025. Media Statement by the Minister of Mines and Minerals Development Honourable Paul C. Kabuswe, MP at the Press Briefing on the Performance of the Mining Sector in 2024. Available at: https://www.mmmd.gov.zm/?p=3792 (Accessed: 5 July 2026).

75 News Diggers (2025) Zambia's Mining Industry Policy Reforms: Perspectives from CTPD. Zambia: News Diggers!, 20 October 2025. Available at: https://diggers.news/guest-diggers/2025/10/20/zambias-mining-industry-policy-reforms-perspectives-from-ctpd/ (Accessed: 6 July 2026).

76 Ministry of Mines and Minerals Development (MMMD) (2026) Guidelines for the Implementation of the Local Content Regulations (Pursuant to the Geological and Minerals Development (Local Content) (Preference for Goods and Services in the Mining Sector) Regulations, 2025). Lusaka: Government of the Republic of Zambia. Available at: https://www.mmmd.gov.zm/wp-content/uploads/2026/04/Local-Content-Guidelines-29-04-2026.pdf (Accessed: 27 July 2026).

4. The Environmental Management Act (2011)[77] (amended in 2013 and 2023)

The Act provides for the continued existence of the Environmental Council of Zambia (ECZ) and renames it as the Zambia Environmental Management Agency (ZEMA).[78] ZEMA is therefore responsible for the sustainable management of natural resources, the protection of the environment, and the prevention and control of pollution. The functions of ZEMA (Section 9 of the Act) include reviewing environmental impact assessment (EIAs) reports and strategic environmental assessment (SEAs) reports. The Act was amended in 2013 to align it with general public finance regulations, and in 2023 to strengthen the environmental assessment system and the management of electronic waste, among other measures.

5. Other laws and regulations

In addition to the above, the mining sector in Zambia is regulated by the Explosives Act of 1974 (as amended in 1994 and 1995), the Lands Act, Cap. 184, the Forest Act No. 4 of 2015, the Water Resources Management Act No. 21 of 2011, and the Urban and Regional Planning Act, 2015. Others include the Zambia Wildlife Act No. 14 of 2015 (as amended in 2026) and the Citizens Economic Empowerment Act No. 9 of 2006 (as amended in 2021).[79] Given the critical role of State-Owned Enterprises (SOEs) such as ZCCM-IH in the sector, the government also enacted the State-Owned Enterprise Act No. 10 of 2026.[80] The Act repeals the Self-Management Enterprise Act Cap 408[81] by establishing a government investment department to, among others, manage government investments and enforce corporate governance standards.

3.5 POLICY AND REGULATORY ISSUES IN ZAMBIA'S MINING SECTOR

1. Failure to maximise benefits from mining

Zambia's mining sector generates significant value for foreign investors, mining companies and the economy.[82] However, stakeholders reported that most of the value is externalised and does not reach local communities or the wider economy. They attributed this outcome to limited local ownership of mining assets, revenue leakages, limited value addition, and inadequate benefit sharing with mining communities.[83] Therefore, Zambia stands to gain more from the mining sector if the country increases public ownership of mining assets and projects, effectively implements the local content regulation to promote the development of local suppliers, and invests in value addition to reduce the export of raw minerals.[84]

2. Incidences of environmental pollution and limited worker safety

Several Chinese mining investments have been in media headlines for poor adherence to environmental regulations and worker rights and safety issues.[85] In February 2026, Zambia experienced a catastrophic tailings dam breach at Sino Metals Leach Zambia LTD in the Copperbelt Province, resulting in the spillage of acidic tailings water and other toxins into the Mwambashi stream.[86] Therefore, stakeholders cited this

77 The Environmental Management Act (2011). https://zambialii.org/akn/zm/act/2011/12/eng@2011-04-15

78 Zambia Environmental Management Agency (ZEMA) (n.d.) Environmental Management Act. Lusaka: Zambia Environmental Management Agency. Available at: https://www.zema.org.zm/environmental_management_act/ (Accessed: 6 July 2026).

79 Ministry of Mines and Minerals Development (2022) National Mineral Resources Development Policy 2022. Lusaka: Ministry of Mines and Minerals Development. Available at: https://www.mmmd.gov.zm/wp-content/uploads/2024/09/National-Mineral-Resources-Development-Policy-2022.pdf (Accessed: 6 July 2026).

80 State-Owned Enterprise Act No. 10 of 2026. https://zambialii.org/akn/zm/act/2026/10/eng@2026-04-08

81 Self-Management Enterprises Act. Capter 408 of the Laws of Zambia. https://www.parliament.gov.zm/node/1427

82 PwC Zambia. (2026). Zambia 2025 Mining Report (4th ed.). Lusaka: PricewaterhouseCoopers Zambia. Available at: https://www.pwc.com/zm/en/publications/zambia-mining-report.html (Accessed: 27 July 2026).

83 Community Focus Group

84 PwC Zambia. (2026). Zambia 2025 Mining Report (4th ed.). Lusaka: PricewaterhouseCoopers Zambia. Available at: https://www.pwc.com/zm/en/publications/zambia-mining-report.html (Accessed: 27 July 2026).

85 Resource Justice Network, 2025. Understanding China's Role in Africa's Transition Minerals: Stakeholders, Dynamics and Opportunities for civil society engagement. Accessed: https://resourcejustice.org/app/uploads/2025/11/CHINA-REPORT-ENGLISH_FINAL-REPORT.pdf & Banda, T.; Hinfelaar, M. 2025. Corruption and the critical mining sector in Zambia. Bergen: U4 Anti-Corruption Resource Centre, Chr. Michelsen Institute (U4 Issue 2025:9). Accessed: https://www.u4.no/publications/corruption-and-the-critical-mining-sector-in-zambia

86 News Diggers Documentary Episode 1 – Chinese Investment in Zambia: The good, the bad and the dangerous. Accessed: https://youtu.be/gKw4JXprrYQ?si=HiUBrWx11K5C0zey

incident, alongside concerns about poor management of tailings dams, air pollution, water contamination, dust emissions, land degradation and weak mine closure practices, as evidence of limited adherence to ESG standards.[87]

The Sino Metals disaster was also cited as evidence of a systematic oversight failure, as several public entities, including ZEMA and the MSD, were expected to monitor both operational and decommissioned tailings dams to ensure that the environment was protected.[88] Although Sino Metals Leach Zambia LTD commissioned and submitted a pollution assessment report to ZEMA following the incident, there is no evidence to suggest that the plant's environmental impact assessment (EIA) is still up to date, or whether annual tailings dam safety checks were done prior to the incident. The study established that it was common practice for mining companies in Zambia to engage consultants to monitor tailings dams and conduct assessments only after pollution incidents and not on an annual or consistent basis.[89]

Furthermore, stakeholders observed limited actions to ensure worker safety, as well as general non-adherence to labour laws among mining companies, including Chinese-owned companies.[90] These observations were consistent with calls from civil society for the Zambian Government to address a troubling pattern of ESG breaches, particularly in operations run by Chinese-owned companies.[91] The study found that worker safety issues included insufficient provision of personal protective equipment (PPEs), long working hours, and inadequate worker compensation. In some Chinese mines, there were significant gaps in adherence to operational and worker safety requirements, as fire outbreaks and fatalities were common. Contributing factors included ignorance of regulations, language barriers, and cultural differences, as well as cost-saving measures, as evidenced by the low quality of sanitary facilities and personal protective equipment (PPE).[92]

3. Weak regulatory enforcement by state institutions

Zambia has inadequate policies, laws and regulatory frameworks to implement and enforce robust environmental and social regulations governing the critical minerals sector to ensure responsible and ethical extraction practices.[93] Consequently, stakeholders noted that the mining sector was characterised by weak regulatory enforcement by state institutions. Although regulators such as ZEMA, local authorities operating in mining areas and the Mines Safety Department, which is now part of the MRC, had clear legal mandates, they often lacked the resources, equipment, staff and technical capacity needed to monitor mining activities effectively.[94] The local authorities also reported that they had insufficient resources to inspect mining activities, often relying on mining companies to provide transportation, equipment and funds through corporate social responsibility.[95] This reliance on mining companies compromises the independence of enforcement actions and regulators' ability to take corrective action.

4. Land acquisition challenges and community displacement

Stakeholders also reported concerns regarding customary land acquisition, weak consultation processes, and displacement of communities, compensation disputes, and a lack of transparency in land administration.[96] Therefore, the increase in copper production to 3 million metric tonnes is likely to compound these challenges, as the growth strategy

87 Community Focus Group

88 Media Focus Group

89 Interview with Local Authority Representatives

90 Community Focus Group

91 Southern Africa Resource Watch (SARW). (2025). SARW Calls for Urgent Action on Environmental and Labour Violations in Zambia's Mining Sector. Available at: https://www.sarwatch.co.za/sarw-calls-for-action/ (Accessed: 27 July 2026).

92 Interview with Local Authority Representatives

93 Ministry of Mines and Minerals Development. (2024). National Critical Minerals Strategy 2024-2028. Government of the Republic of Zambia. https://www.mmmd.gov.zm/wp-content/uploads/2024/09/1-National-Critical-Minerals-Strategy-2024-%E2%80%93-2028-Booklet-August-27-2024.pdf

94 Interview with Local Authority Representatives

95 Interview with Local Authority Representatives

96 Community Focus Group

includes promoting investment in exploration, mining, processing and value addition.[97] These concerns are consistent with previous reviews which noted several weaknesses in sector governance, including issues concerning land access, compensation and resettlement; and the absence of revenue sharing between national and local government.[98] Even though traditional leaders and local authorities are influential actors in land transactions, the system lacks transparency and often fails to adequately incorporate community interests.[99]

97 Ministry of Mines and Minerals Development (MMMD) (2024) National Strategy Towards Achieving Three (3) Million Metric Tonnes of Copper Production by 2031. Lusaka: Ministry of Mines and Minerals Development. Available at: https://www.mmmd.gov.zm/wp-content/uploads/2024/08/2-National-Three-3-Millions-Tonnes-Copper-Production-Booklet-August-27-204.pdf (Accessed: 28 July 2026).

98 World Bank (2016) Zambia: Systematic Country Diagnostic. Washington, DC: World Bank Group. Available at: https://documents1.worldbank.org/curated/en/305921468198529463/pdf/105820-REVISED-PUBLIC-Zambia-Report-ONLINE.pdf (Accessed: 28 July 2026).

99 Widengård, M. (2019) 'Land deals, and how not all states react the same: Zambia and the Chinese request', Review of African Political Economy, 46(162), pp. 615–631. Available at: https://www.jstor.org/stable/48592515 (Accessed: 28 July 2026).

4 GOVERNANCE AND CORRUPTION RISKS ASSOCIATED WITH CHINESE MINING IN ZAMBIA

Using the framework of the Mining Awards Corruption Risk Assessment (MACRA) Tool,[100] developed by the Transparency International Accountable Mining Programme, the study examined legal, policy, and regulatory frameworks and processes and critically considered the actual practice and implementation of laws in the mining sector. Furthermore, using the Initiative for Responsible Mining Assurance (IRMA) Standard,[101] the study extended the assessment beyond the mining awards process to consider the level of adherence to governance and licence standards during operation. The following governance and corruption risks were identified following the analysis:

Priority risk 1: Risk of corruption and fronting of citizens in land acquisition

According to the stakeholders, some Chinese investors in Zambia acquired customary land through non-transparent arrangements, including negotiating directly with chiefs or individual landowners.[102] Studies have found that Chinese investors often attempted to acquire huge portions of land through influencing politicians and traditional leaders.[103] In several mining districts, new Chinese mining expansions targeted mineral deposits within farming areas. These Chinese-owned projects often purchased agricultural land and obtained consent at less than market price due to limited access to geological information by surface right holders. In addition, the use of agricultural land for mining activities often led to pollution of neighbouring farms, thereby jeopardising food security in these areas.[104] Consequently, a group of Copperbelt farmers in Zambia filed an $80 billion lawsuit against two Chinese mining companies, alleging that decades of pollution and ecological mismanagement have devastated their land, water, health, and livelihoods.[105]

Priority Risk 2: Excessive scope of political interference and regulatory capture

Stakeholders noted that some Chinese mining companies cultivated political relationships with influential politicians to obtain favourable treatment.[106] This perception is consistent with other studies that identified an intricate web of politically exposed persons (PEPs) doing business with the critical minerals mining sector in Zambia.[107] The identified political relationships were often cultivated through procurement-based exchange of favours between Chinese mining companies and politically affiliated local businesses[108] This finding is also consistent with the IMF Governance Diagnostic Assessment, which found evidence of serious governance and corruption vulnerabilities related to granting and managing contracts in the mining sector, limited transparency in public procurement, and inadequate monitoring of activities of PEPs.[109]

100 Transparency International Australia. (n.d.). MACRA Tool (Mining Awards Corruption Risk Assessment Tool). Available at: https://mining.transparency.org.au/macra-tool/ (Accessed: 30 June 2026).

101 Initiative for Responsible Mining Assurance (IRMA). (n.d.). IRMA Standard for Responsible Mining. Available at: https://responsiblemining.net/what-we-do/standard/irma-mining-standard/ (Accessed: 30 June 2026).

102 Community Focus Group and Interview with Local Authority Representatives

103 Widengård, M. (2019) 'Land deals, and how not all states react the same: Zambia and the Chinese request', Review of African Political Economy, 46(162), pp. 615–631. Available at: https://www.jstor.org/stable/48592515 (Accessed: 28 July 2026).

104 Community Focus Group

105 BBC News (2025) China-linked mine pollution disaster sparks concern in Zambia [example title only]. BBC News, [publication date]. Available at: https://www.bbc.com/news/articles/cy7p51l60rro (Accessed: 28 July 2026).

106 Interview with Local Authority Representatives

107 Banda, T. and Hinfelaar, M. (2025) Corruption and the Critical Mining Sector in Zambia. Bergen: U4 Anti-Corruption Resource Centre. Available at: https://www.u4.no/publications/corruption-and-the-critical-mining-sector-in-zambia/fullversion#corruption-risk-analysis-hazards-and-loopholes-along-the-critical-mineral-value-chain

108 Community Focus Group and Interview with Local Authority Representatives

Political interference and regulatory capture were therefore enabled by the general lack of transparency in the procurement of goods and services by Chinese mining companies.[110] The opacity facilitated the award of contracts based on personal connections, favouritism towards affiliated businesses and elite capture of local content opportunities. Furthermore, there were also concerns regarding conflict of interest, as some politicians held undisclosed mining rights and business interests.[111] This is because Zambia has no comprehensive law to regulate conflict-of-interest disclosures among public officials. There has been low compliance with asset-declaration requirements among public officials, coupled with limited transparency in verifiable beneficial ownership information.[112]

Priority Risk 3: Threats and bribery during inspections and monitoring

Stakeholders submitted that some Chinese mining companies sought to avoid costly corrective measures, especially those which disrupted ongoing business operations. Therefore, inspections conducted by local authorities and ZEMA inspectors often resulted in negotiations, threats and bribery.[113] On the other hand, armed with knowledge of Chinese companies' strong aversion to business disruptions, some public officials and inspectors also requested bribes during inspections, as they exercised significant discretion in determining enforcement actions. This was because inspectors often decided whether to pause operations while the mine addressed the inspection recommendations, or to continue operations while addressing the recommendations. The 2024 Zambia Bribe Payers Index Survey found an 85.7 per cent prevalence of bribery in Zambia's mining sector, indicating that bribery is widespread.[114] The high prevalence of bribery in the sector contributed to limited adherence to ESG standards, as monitoring and enforcement actions were compromised. Civil society also identified significant gaps in ESG regulation, practice, and enforcement that enabled some mining companies, including Chinese mining companies, to operate with minimal regard for ESG standards.[115]

Priority Risk 4: Information suppression and influence of media narratives

The media focus group discussion identified information control as a significant governance risk. Some Chinese companies offered bribes and advertisements to journalists and media houses, respectively, to control or suppress media stories, especially those on pollution incidents.[116] In addition to these actions, Chinese entities have also taken legal action against media houses in Zambia. The Chinese Chamber of Commerce attempted to restrain, through a court injunction, the release of a documentary produced by News Diggers, a local media house in Zambia.[117]

Although the Chinese Chamber of Commerce asserted that the documentary perpetuated negative narratives about China and Chinese investment in Zambia,[118] international observers considered the action as an attempt to silence public interest journalism and press freedom.[119] Furthermore, there were also reports of restricted access to affected communities, amidst limited transparency following environmental incidents. A German journalist was restricted from conducting interviews with affected communities at NFC Africa Mining in Kalulushi, under the pretext of failure to follow appropriate procedures in gaining access to the mining host communities.[120]

---

109 International Monetary Fund (IMF) (2023) Zambia: Technical Assistance Report on Governance and Corruption Diagnostic Assessment. IMF Country Report No. 23/006. Washington, DC: International Monetary Fund. Available at: https://www.imf.org/-/media/files/publications/cr/2023/english/1zmbea2023001.pdf (Accessed: 28 July 2026).

110 Interview with Local Authority Representatives

111 Interview with representatives from Law Enforcement

112 International Monetary Fund (IMF) (2023) Zambia: Technical Assistance Report on Governance and Corruption Diagnostic Assessment. IMF Country Report No. 23/006. Washington, DC: International Monetary Fund. Available at: https://www.imf.org/-/media/files/publications/cr/2023/english/1zmbea2023001.pdf (Accessed: 28 July 2026).

113 Interview with representatives from Local Authorities

114 Transparency International Zambia and Anti-Corruption Commission (2025). 2024 Zambia Bribe Payers Survey Report. Available at: https://tizambia.org.zm/wp-content/uploads/2025/03/TIZ-Survey-report.pdf

115 Joint CSO Media Statement on Mining Related Pollution. March 2025. Accessed: https://tizambia.org.zm/2025/03/joint-statement-for-immediate-release/

116 Media Focus Group

117 News Diggers (2025) Diggers Free to Air Documentary as Court Lifts Injunction. Lusaka: News Diggers!, 18 July 2025. Available at: https://diggers.news/courts/2025/07/18/diggers-free-to-air-documentary-as-court-lifts-injunction/ (Accessed: 28 July 2026).

118 Ibid.

5 CONCLUSION AND RECOMMENDATIONS

The study found evidence of considerable Chinese investment in the critical minerals sub-sector. Out of the 14 large-scale mining projects, seven were Chinese-owned and accounted for 25 per cent of the government revenue from the sector in 2025. These included Chambishi Copper Smelter LTD (CCS), CNMC-Luanshya Copper Mines PLC, Non-Ferrous Company Africa Mining PLC (NFCA) and Lubambe Copper Mine LTD. It was, also, notable that the Zambian state-owned Zambia Consolidated Copper Mines Investments Holdings (ZCCM-IH) held a minority stake in most of these large-scale Chinese-owned mines, reflecting Zambia's ambition to ensure some ownership of its mineral resources, in addition to a strong partnership between Zambia and China in the mining sector.

The policy, legal and regulatory framework governing the mining sector, including the critical minerals sub-sector in Zambia, was found to be inadequate, as it was ineffective in enforcing robust, responsible and ethical extraction. Consequently, the sector experienced several policy and regulatory challenges, including a failure to maximise benefits from mining, incidences of environmental pollution and limited worker safety, weak enforcement by state institutions, and land administration challenges and community displacement. The major governance and corruption risks associated with Chinese mining included corruption and the fronting of citizens in land acquisitions, political interference and regulatory capture, bribery during inspections and pollution monitoring, information suppression and undue influence of the media. The study was conducted during the period March to June 2026 and did not capture the impact of recent mining sector legal and institutional reforms.

Recommendation 1: Strengthen the policy, legal and regulatory framework to enhance adherence to responsible mining practices and ethical extraction

- Review the National Three (3) Million Tonnes Copper Production Strategy (NTMTS) to integrate priority interventions and objectives on mitigating environmental and social risks associated with increased production. Even though the National Critical Minerals Strategy (2024–2028) has an intervention on enhancing environmental, social and governance frameworks in the critical minerals value chain, the NTMTS is prominently focused on increased production, with little consideration for the potential environmental impact of higher production, given the limited adherence to ESG standards in the sector.
- Enhance coordination, implementation, and enforcement of laws governing mining and land administration, particularly where mining rights overlap with surface rights. This will contribute to transparent and inclusive negotiations and decision-making processes, ensuring that traditional leaders, communities, and other key actors have a voice in land allocation and mining governance.[121]
- Maintain a stable and predictable mining fiscal regime to attract more investment while maximising the contribution of the sector to government revenue. The Zambia EITI notes that the country has repeatedly altered its mining fiscal regime, creating ongoing debate regarding the need for a more stable and predictable legal framework to balance investment attraction and revenue generation.[122]

119 Committee to Protect Journalists (CPJ) (2025) Zambian Court Blocks Film Investigating Chinese Businesses. New York: Committee to Protect Journalists, 6 June 2025. Available at: https://cpj.org/2025/06/zambian-court-blocks-film-investigating-chinese-businesses/ (Accessed: 28 July 2026).

120 News Diggers! (2025) Chambishi Police Caution German Journalist Found Interviewing Residents at NFC Mining. Lusaka: News Diggers!, 1 October 2025. Available at: https://diggers.news/local/2025/10/01/chambishi-police-caution-german-journalist-found-interviewing-residents-at-nfc-mining/ (Accessed: 28 July 2026)

121 Centre for Environment Justice. (2024). Critical minerals and land use governance in Zambia (CMLUZ): 2024. https://cejzambia.org/2024-critical-minerals-and-land-use-governance-in-zambia/

122 Extractive Industries Transparency Initiative (EITI) (n.d.) Zambia. Available at: https://eiti.org/countries/zambia (Accessed: 28 July 2026)

Recommendation 2: Strengthen the enforcement capacity of public entities and monitor corruption preventive measures

- Develop a sector-specific anti-corruption strategy and enhance the implementation of sector-specific preventive measures. Notably, the Anti-Corruption Commission has limited customised measures aimed at mitigating corruption risks in the mining sector. There is a need to complement the Integrity Committee at the Ministry of Mines and Minerals Development, improve collaboration with the ACC, and establish another integrity committee at the Minerals Regulation Commission.
- Increase funding commensurate with mining production ambition to the local authorities in mining areas, ZEMA and the Mineral Regulation Commission (MRC) to address institutional incapacities including transportation, staffing and equipment, as well as preventing environmental disasters.
- Improve coordination among enforcement agencies, including ZEMA, local authorities and the MRC to ensure that mining companies are not overwhelmed by enforcement recommendations. The issuing of uncoordinated recommendations reinforces the need for Chinese mining companies to maintain political relationships with PEPs.
- Ensure comprehensive on-boarding of Chinese investors to ensure that they have a good understanding of the regulatory frameworks and laws as well as the process of mining-related approvals with the different public entities. Stakeholders noted that the high risk of bribery was due to limited understanding of the processes and timelines for approvals.

Recommendation 3: Mitigate political interference through declaration of interest and promoting transparency in procurement processes

- Enact a comprehensive law to mandate the effective declaration of interest and periodic declaration of assets and liabilities for all senior public officials. Although the Parliamentary and Ministerial Code of Conduct Act No. 35 of 1994 establishes the code of conduct, including provisions on integrity, disclosure of interests, assets, liabilities, and ethical conduct in public office, it excludes most senior public officials.
- Accelerate the review of the Anti-Corruption Act to expand coverage of the offence of abuse of public office. The current Act excludes state officers (i.e. the President, Vice-President, Speaker, Deputy Speaker, Member of Parliament, Minister and Provincial Minister), councillors, constitutional office holders (i.e. the Secretary to Cabinet, Attorney-General, Solicitor-General, Director of Public Prosecutions, Secretary to Treasury, and permanent secretaries), judges and judicial officers.

Recommendation 4: Enhance media freedom and transparency during mining pollution incidents

- Ensure press and media freedom during mining-related pollution incidents to promote objective reporting. The media have a right to information, which should be protected during public health, worker safety and pollution incidents. The respective mining company and government should coordinate with the media and journalists to allow safe access to affected communities, rather than imposing unreasonable restrictions, as this escalates suspicion of wrongdoing and underhandedness.
- Ensure timely disclosure of accurate information from the government (ZEMA, Ministry of Green Economy and Environment, as well as respective mining companies). Timely disclosure will promote public trust and provide assurance that the duty bearers are effectively redressing public and environmental concerns.

Transparency International Australia

Registered Office:
Level 41, 161 Castlereagh Street,
Sydney NSW 2000

Mailing and Street Address:
PO Box 13276 Law Courts VIC 8010

info@transparency.org.au
+61 (03) 9018 7551
www.transparency.org.au

linkedin.com/company/ti-australia
Instagram @transparency.international.aus