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# REVIVING THE SLEEPY VISION: AN EVALUATION OF THE IMPLEMENTATION STATUS OF THE AFRICA MINING VISION



**Africa  
Centre for  
Energy Policy**



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## **Abstract**

*The implementation process of the Africa Mining Vision (AMV) has been slow since its inception in 2009, even though African governments recognize that the transformation of the Continent can be facilitated by the re-organization of the governance processes around resource extraction. Notwithstanding the slow process, the paper finds that some efforts have been made. These include development of the action plan for the implementation of the AMV as well as the establishment of the Africa Minerals Development Centre (AMDC) to provide technical assistance to member states in realizing the Vision. Through desktop study and stakeholder engagement, the paper examines why the process of implementing the AMV has been slow. It finds that although the AMDC's role is to support country implementation of the AMV, its support is demand driven. Contrarily, African Heads of State have not owned the process to demand support from the AMDC. The paper recommends that the Africa Union must task a higher panel of African leaders to monitor implementation with timelines, for the Continent to immediately realize the tenets of the AMV in the shortest possible time.*

*Key words: Africa, Minerals, AMV, AMDC.*

# Africa and Mineral Resources

Geography has bequeathed Africa an impressive endowment of mineral wealth. The continent is host to near-global monopolies of platinum-group metals, chromium and diamonds; a high proportion of the world's gold, cobalt and manganese reserves; and extensive reserves of bauxite, coal, soda ash, uranium, copper and nickel.<sup>1</sup>

Producing over five dozen different types of metals, minerals and ores, the continent is home to about a third of global reserves of extractive resources.<sup>2</sup> About half of African economies are "commodity dependent". That is, these countries derive a significant part of their incomes from the export of commodities, dominated by minerals.

**Table 1: Africa's global share and ranking of mineral wealth**

EXPORT MINERALS	AFRICAN % OF WORLD	AFRICAN RANK IN WORLD	AFRICAN OF WORLD RESERVES	RANK IN GLOBAL SHARE
Platinum Group Metals	54%	1	60+%	1
Phosphate	27%	1	66%	1
Gold	20%	1	42%	1
Chromium	40%	1	44%	1
Manganese	28%	2	82%	1
Vanadium	51%	1	95%	1
Cobalt	18%	1	55+%	1
Diamonds	78%	1	88%	1
Aluminium	4%	7	45%	1

Credit: UNCTAD

All of Africa's top five exports are mineral-related<sup>4</sup>. One country, South Africa, stands out as the world's leading producer of chromite and ferrochromium, gold, palladium, platinum, and vanadium and the world's second ranked producer of manganese and ferromanganese, rutile, and zircon<sup>5</sup>. Yet countries on the continent rank lowest in the Human Development Index and most other indicators of wellbeing. Indeed, with the rise of China and India, poverty decidedly has an African face.

The paradox of Africa's natural resource wealth vis-a-

vis a widespread poverty of its one billion population, remains a deep and often-noted feature of the continent's economic landscape,<sup>6</sup> thus further highlighting the perils of commodity dependence and the dominant extractive model.<sup>7</sup> In most African countries, the sector operates as an enclave with limited connection to or practically delinked from the broader economy.

The commodity price boom of the 2000s and the increasing demand for natural resources from emerging countries such as China and Brazil intensified the debate on the most appropriate models for resource-driven

<sup>1</sup> UNCTAD (2005): *Economic Development in Africa: Rethinking the Role of Foreign Direct Investment*. United Nations: New York and Geneva, pg. 6. <http://unctad.org/en/pages/PublicationArchive.aspx?publicationid=49>

<sup>2</sup> Dittrich M, Giljum M, Lutter S, Polzin C (2012): *Green economies around the world? Implications of resource use for development and the environment*. SERI, Vienna, Austria. [https://www.boell.de/sites/default/files/201207\\_green\\_economies\\_around\\_the\\_world.pdf](https://www.boell.de/sites/default/files/201207_green_economies_around_the_world.pdf)

<sup>4</sup> International Monetary Fund (Apr 2016): *Weathering the commodity price slump, Regional Economic Outlook, Sub-Saharan Africa*. IMF: Washington, D.C. UNECA (2015), *Controlling Africa's natural resources needs knowledge and good governance* <http://www.uneca.org/stories/controlling-af-rica%E2%80%99s-natural-resources-needs-knowledge-and-good-governance>

<sup>5</sup> African Development Bank (2007). *Natural Resources for Sustainable Development in Africa Chapter 3*, pp. 63 [https://www.afdb.org/fileadmin/uploads/afdb/Documents/Publications/\(D\)%20AfricanBank%202007%20Ch3.pdf](https://www.afdb.org/fileadmin/uploads/afdb/Documents/Publications/(D)%20AfricanBank%202007%20Ch3.pdf)

<sup>6</sup> UNECA (2011): *Minerals and Africa's development: The International Study Group Report on Africa's Mineral Regimes*. UNECA: Addis Ababa, pp 9. [http://www.uneca.org/sites/default/files/publications/mineral\\_africa\\_development\\_report\\_eng.pdf](http://www.uneca.org/sites/default/files/publications/mineral_africa_development_report_eng.pdf)

<sup>7</sup> World Bank (1992). *Strategy for Africa mining*, World Bank technical paper No. 181. <http://documents.worldbank.org/curated/en/722101468204567891/pdf/multi-page.pdf>

development particularly after the promised dividends (jobs, economic transformation, more taxes and basic infrastructure) of the 1980s and 1990s IMF/World Bank led reforms failed to materialize.

Mining has a tremendous role to play in Africa's development agenda. However, the asymmetric sharing of benefits from the economic activity created by the huge mining industry undermines the enormous potential of the sector to catalyse transformative development in the host countries.<sup>8</sup>

## New paradigm

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In February 2009, African Heads of State and Government adopted the AMV (the Vision) as the continental framework to promote mineral re-source-based development and structural transformation.

As the clearest expression of Africa's aspiration to shift from 'norm-taker' to 'norm-setter' for its mining sector, the AMV represents a paradigm shift away from raw commodity export dependency towards improving Africa's industrial base through enhanced local beneficiation and value addition of minerals.

As a strategy, the AMV goes beyond improving mineral regimes as a stand-alone to establish how mineral sectors can better contribute to local, national and regional economic development, and ultimately to Africa's structural transformation.

The AMV, along with its Action Plan for implementation, is inspired not the least by a disconcerting irony of a continent significantly endowed with mineral wealth, yet ranks among the poorest regions of the world. Both internal and external factors converge to create this situation. Internally, weak governance, institutional weaknesses, and corruption are major problems. External factors include entrenchment of the colonial of extraction where Africa exports bulk commodities and imports processed products and a skewed international

Hence, the finite nature of minerals, commodity boom and pressure from society that mining was not benefiting African countries triggered widespread calls for a new developmental approach in which mineral resources would play a catalytic role in promoting economic transformation and development, based on increased linkages with the local economy, extensive knowledge of the resource potential, effective revenue management, and cross boarder infrastructure development to improve trade among African countries. This underlined the development and birth of the Africa Mining Vision (AMV).

trade and financial architecture that relegates Africa to the periphery of the global decision-making process and systems.

AMV envisions the exploitation of minerals as a key element of strategy of an industrialisation driven structural transformation of African countries; and therefore, advocates for far reaching reforms in the overall governance of the mineral economy and greater transparency and accountability of firms and governments and an end to discrimination against Artisanal and Small-scale Mining (ASM). Given that Mineral resources are finite, it is critical that they are managed effectively, efficiently and sustainably to benefit both current and future generations.

The main goal of the Vision is to create a - *"Transparent, equitable and optimal exploitation of mineral resources to underpin broad-based sustainable growth and socio-economic development."*

The AMV is, in effect much more than mining. It is about development as it essentially seeks to use Africa's extractive sector to transform the continent's social and economic development paths.

The AMV seeks to enhance transparency, equity and

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<sup>8</sup> Sigam, C and Garcia, L. (2012): *Extractive Industries: Optimising Value Retention in Host Countries*. UNCTAD: Geneva, pp1. [http://unctad.xiii.org/en/SesionDocument/suc2012d1\\_en.pdf](http://unctad.xiii.org/en/SesionDocument/suc2012d1_en.pdf)

optimal development of mineral resources to underpin broad-based sustainable growth and socio-economic development in Africa. It also promotes a sustainable and well-governed minerals sector that effectively garners and deploys resource rents and that is safe, healthy, gender and ethnically inclusive, environmentally friendly, socially responsible and appreciated by mine-affected communities.

The AMV is the most ambitious of various national, regional and continental mining reform frameworks developed in Africa in recent years. The sustained rise in mineral prices in the years before the 2008 global financial and economic crises was an important factor in the development and adoption of the Vision. The wide gap between increased corporate profits and fiscal returns to governments deepened growing disquiet among African governments about the failure of the dominant liberalised mining model to deliver on its economic promises, particularly unmet revenue and development expectations since the 1980s. This shift in official African perspectives occurred in a global context of mineral exporting countries, especially in,

taking steps to correct the imbalances in benefit sharing between host countries and mining corporations towards more favourable returns to host countries and mining communities.

Thus, the AMV reflects African governments' growing confidence, assertiveness and willingness to challenge the dominant economic model and pursue home-grown development initiatives to uplift their populations from underdevelopment.

The AMV is premised on the concept of the developmental state – a greater role for the state, including the state playing a decisive and firm role as well as pursuit of activist industrial policy-making and implementation.

The Vision goes beyond improving mining regimes to establish how mining can better contribute to local, national, sub-regional and continental socio-economic development. It also incorporates global norms and standards, within an overall framework of restructuring Africa's relationship with the mining industry.

## Critical pillars of the AMV

**Table 2: Pillars defined in the AMV Action Plan**

<p>The AMV is founded on the following fundamental pillars:</p> <ol style="list-style-type: none"> <li>1. Optimizing knowledge and benefits of finite mineral resources at all levels of mining and for all minerals;</li> <li>2. Harnessing the potential of small scale mining to improve rural livelihoods and integration into the rural and national economy;</li> <li>3. Fostering sustainable development principles based on environmentally and socially responsible mining, which is safe and includes communities and all other stakeholders;</li> <li>4. Building human and institutional capacities towards a knowledge economy that supports</li> </ol>	<p>innovation, research and development;</p> <ol style="list-style-type: none"> <li>5. Developing a diversified and globally competitive African mineral industry which contributes to broad economic and social growth through the creation of economic linkages;</li> <li>6. Fostering a transparent and accountable mineral sector in which resource rents are optimized and utilized to promote broad economic and social development; and</li> <li>7. Promoting good governance of the mineral sector in which communities and citizens participate in mineral assets and in which there is equity in the distribution of benefits.</li> </ol>
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**Source: AMV Action Plan, 2011**

# Clusters of the AMV

The AMV hopes to deliver economic transformation of the continent through the nine key clusters defined in the Action Plan for the implementation of the AMV adopted by conference of ministers responsible for mineral resources development.

**Table 3: The nine key clusters defined in the AMV Action Plan**

<b>1. Fiscal regime and revenue management</b>	<b>Capacity to negotiate contracts, efficient and progressive fiscal regime and effective utilisation of revenue that reflects on intergenerational equity.</b>
<b>2. Geological and minerals information systems</b>	Understanding the resource potential of countries through geological data acquisition to aid negotiations with investor and resource development planning.
<b>3. Building human and institutional capacities</b>	Improving the capacity of institutions; effective institutions with optimal coordination. Building local human capital to participate in the extractive sector.
<b>4. Artisanal and small-scale mining</b>	Rethinking the small-scale mining sector to improve practice, enhance sustainability, reduce negative impact by regulations and provide assistance to the over 80 million Africans engaged in artisanal mining.
<b>5. Mineral sector governance</b>	Improve transparency (compliance with transparency principles such as EITI and Kimberly Process), effective monitoring of contractors/ operators. In the absence of capacity to audit companies for example, it is recommended that countries outsource capacity while local capacity is built over time.
<b>6. Research and development</b>	Develop context appropriate technologies through investment in competencies and collaboration with multinational corporation, research institutions, and universities. It calls on governments and multinational corporations to invest in research and development to create a knowledge driven sector for diversification of the economies of Africa.
<b>7. Environmental and social issues</b>	Extraction with minimal impact on the environment and protections of the vulnerable people in society.
<b>8. Linkages and diversification</b>	Upstream, downstream and side stream integration of the economies to the mining sector. This provides greater benefits in supply chain localisation, effective power supply, road and water infrastructure, etc., for the benefit of the general economy.
<b>9. Mobilising minerals and infrastructure for development</b>	Increasing investment for the mining sector and building needed infrastructure to link sub-regional countries on the back of mineral resource. This is aimed at reducing logistics cost which is about 250% higher than the global average

**Source: AMV Action Plan, 2011.**

Gender is considered in the AMV as a cross-cutting issue to be tackled across the entire mineral value chain to maximise the benefits of mining to all of society including future generations.



## Progress made with the implementation of the AMV

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Some progress has been made with the implementations of the AMV. Two years after the adoption of the vision, African Ministers in charge of mineral resource development approved the AMV Action Plan in December 2011, which elaborates the core elements and steps for the comprehensive reform

and implementation of the AMV. Flowing from the Action Plan, several steps have since been taken, including the establishment of the African Minerals Development Centre (AMDC) as the focal continental and technical body to aid member countries in the implementation of the AMV.

## Africa Mineral Development Center (AMDC)

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The African Mineral Development Center (AMDC) was established in 2011 to provide technical assistance to countries for the implementation of the AMV. It was recognized as a necessary body for the effective and accelerated implementation of the vision in individual country context. The mission of the AMDC is to work with Africa Union (AU) member states and their national and regional organizations including the Africa Union Commission (AUC), the NEPAD Planning and Coordinating Agency (NPCA), and Regional Economic Communities (RECs) to promote transformative role of the mineral resources in the development of the continent through increased economic and social linkages, and to help address its willful poverty and limited development.

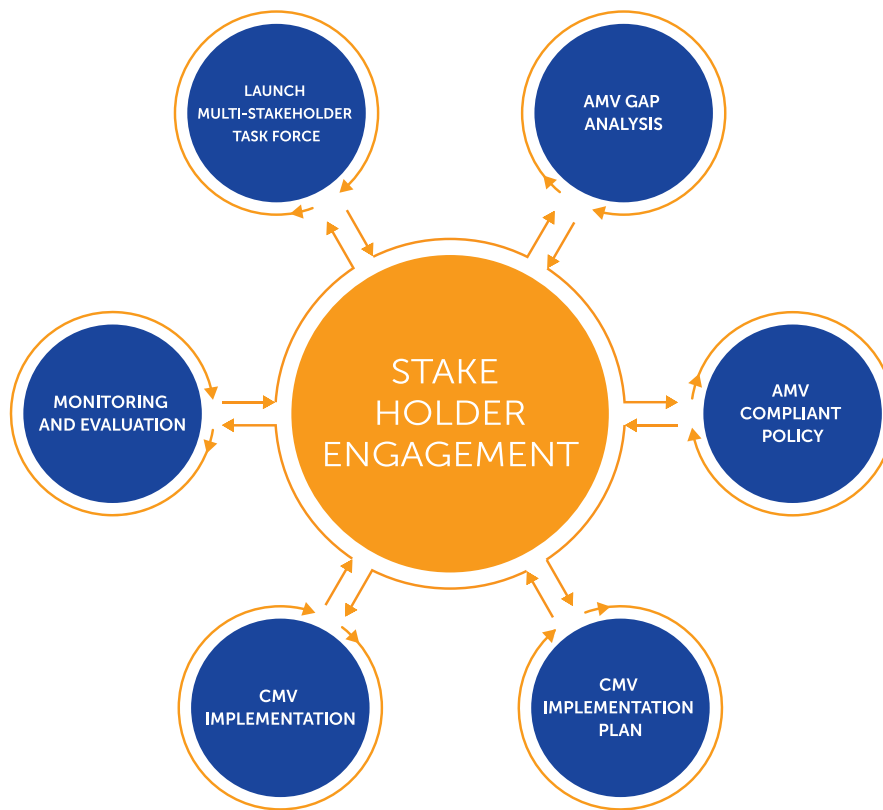
However, the AMDC is demand driven. They can only engage in supporting countries through the process of contextualizing the AMV on request by the countries. This limits the AMDC on its interventions in

the implementation of the AMV, ostensibly explaining the slow pace in the adoption of the AMV into Country Mining Visions (CMVs).

Regardless of challenges faced by the AMDC, some significant progress have been made by the body, including the development of guiding frameworks, research documents, and provision of support to countries which have shown interest in contextualizing the AMV.

The AMDC developed the CMV Guide Book which is a vital tool for government to initiate the participatory multi-stakeholder processes needed for national implementation of the AMV. The six stage CMV process involves launching a multi-stakeholder task force, examining the gaps in-country in relation to the AMV, developing AMV compliant policies, developing action plan for the CMV, implementing the CMV and monitoring the implementation of the CMV.

**Figure 1: The CMV Process**



**Source: CMV Guide Book**

Many countries are at different stage of mineral development. Therefore, the CMV process carefully analyses the context to predict and prescribe the implementation trajectory in a process driven by broad stakeholder engagement. The CMV process supports countries to develop their mining sector in ways that are responsive to job creation, geopolitics, political economy of mineral resource extraction, societal pressures, market dynamics, business fundamentals and current and future concerns.<sup>9</sup>

Thus far, about 24 countries have initiated the process. These include Angola, Burkina Faso, Central African Republic, Chad, Republic of Congo, Côte d’Ivoire, Democratic Republic of Congo, Ethiopia, Equatorial Guinea, Gambia, Ghana, Guinea, Kenya, Lesotho, Malawi, Mali, Mozambique, Niger, Nigeria, Rwanda, Sierra Leone, Tanzania, Zambia and Zimbabwe. The table below shows the status of implementation of some of the countries.

**Table 4: example of countries that have started the CMV process**

COUNTRY	STATUS OF CMV PROCESS	DATES
Malawi	At the initial stage of implementing the CMV	As of January 2017
Chad	At the initial stage of implementing the CMV	As of June 1, 2017
Ghana	AMV Compliant Policy Development	As of 2017
Kenya	At the initial stage of implementing the CMV	As of April 2017
Liberia	AMV Compliant Policy development	As of March 2017

<sup>9</sup> Pedro M. A. A. (2015). The Country Mining Vision: Towards a New Deal. [http://www.oefse.at/fileadmin/content/Downloads/Publikationen/Oepol/Artikel2015/Teil1\\_02\\_Country\\_Mining\\_Pedro.pdf](http://www.oefse.at/fileadmin/content/Downloads/Publikationen/Oepol/Artikel2015/Teil1_02_Country_Mining_Pedro.pdf)

COUNTRY	STATUS OF CMV PROCESS	DATES
Mozambique	At the initial stage of implementing the CMV	As of April 2017
Nigeria	AMV Gap Analysis stage	As of June 11, 2017
Sierra Leone	AMV Compliant Policy development	As of 2017
Tanzania	At the initial stage of implementing the CMV	As of March 7, 2017
Lesotho	The only country in the implementation stage of the CMV	As of 2017

**Source: ACEP Compilation**

**Table 4** shows the slow implementation of the CMVs with many countries still at the initial stage of implementing the CMV process eight years after the AMV was adopted. Only Lesotho has thus far been able to complete the policy development process and moved onto implementation. There are many other countries that are yet to invite the AMDC to support the process.

## The Future of Africa and Minerals Development

The continent is seized with the reality that mineral resources hold the promise to a transformed continent from the current state characterised by hunger, extreme poverty, poor environmental governance, poor infrastructure and lack of technology to promote efficient resource development. This called for a rethink of the mineral sector governance on the continent. Consequently, several documents have been produced by regional and sub regional bodies on the need for reforms and maximisation of benefits. These include the AMV, report of the AU high panel on Illicit Financial Flows (IFFs), the Economic Community of West African States (ECOWAS) mining directive etc.

African governments have committed to improve the lives of its people in the next 50 years. The Agenda 2063

hopes that by 2063, African countries will be amongst the best performers in global quality of life measures. This will be attained through strategies for inclusive growth, job creation, increasing agricultural production; investments in science, technology, research and innovation; gender equality, youth empowerment and the provision of basic services including health, nutrition, education, shelter, water and sanitation. This is an ambitious aspiration that demands resource improved governance and the periodic monitoring of actions in order to achieve results. Mineral resource holds the promise to aid this transformation in the midst of two important risk factors; population growth and "new minerals"<sup>10</sup> for energy transition.

## Population Growth

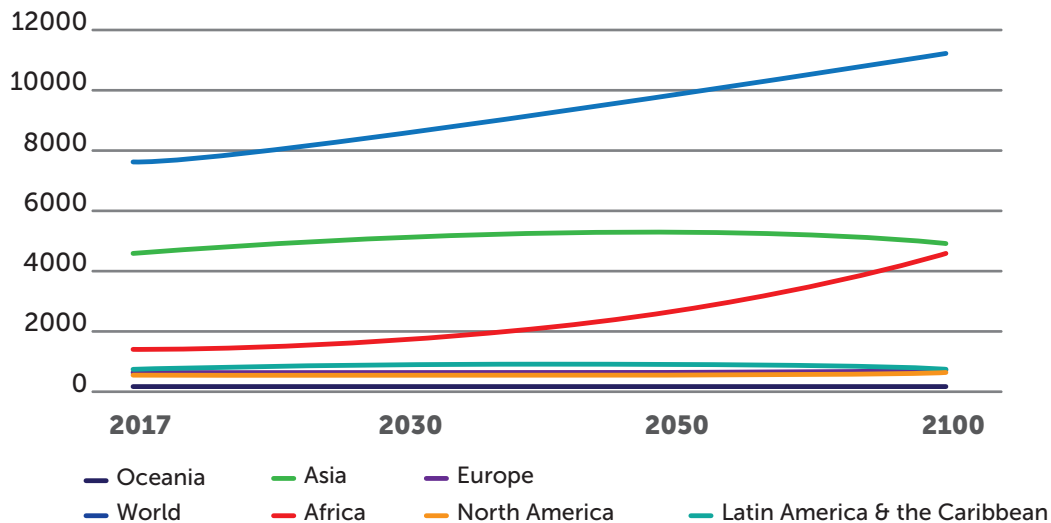
The global population growth will be influenced significantly by Africa. By 2050, Africa will represent a fifth of the world population from the current 17%. Out of the about 2.2 billion increases in population over the period, Africa will contribute about 1.3 billion to the

global population growth. Figure two below show that Africa's population will continue to increase at the turn of the 22nd century. This is contrary to the happenings in the rest of the world, where population is set to stagnate or decline.

<sup>10</sup> In this context, new minerals refer to mineral that are increasingly becoming imports on the back of green growth technologies.



**Figure 2: Global estimated population growth trend by region**



**Source: ACEP with data from United Nations, Department of Economic and Social Affairs, Population Division (2017).**

To ensure attainment of the Continental agenda of improved human development indices, conscious efforts are required to monitor capacity development of the increasing population who in turn will contribute to

economic growth of countries. Otherwise the trend in population growth could undermine the agenda 2063 if poorer populations are added to the growth.

## New Minerals

The demand for cleaner cities and climate friendly technologies is driving up the demand for some of Africa’s mineral resources. Demand for minerals such as Cobalt, graphite, lithium etc. are on the rise to provide raw material for battery technologies for electronic good; including phones, tablets, electric cars, and renewable energy storage for both grid and off-grid

systems.

Recent policies in some advanced countries could contribute to substantial rise in the demand for these minerals. Countries such as Norway, Germany, UK, France and India have already set target for transitioning from fossil based transportation to full electric systems.

**Table 5: Countries ready to transition to electric cars**

COUNTRY	YEAR OF IMPLEMENTING BAN
Germany	Total ban on internal combustion engines by 2030
United Kingdom	Ban on new fossil fuel cars by 2040
Norway	Total ban on fossil fuel cars by 2025
India	Ban on new fossil fuel cars by 2030
France	Ban on all fossil fuel cars 2040

**Source: futurism <sup>11</sup>**

<sup>11</sup> Galeon, D. (2017). Futurism: clean energy on wheels. <https://futurism.com/these-7-countries-want-to-say-goodbye-to-fossil-fuel-based-cars/>

Other countries such as China and the United States are some of many other countries considering a future ban on petrol and diesel cars. Beyond those countries, electric cars and renewable energy technologies will also contribute to the growth of demand for those minerals. Solar technology has been improving and becoming cheaper by the day. This has also coincided with improved battery technology that depends primarily on cobalt, nickel, manganese, lithium and graphite.

Africa is endowed with significant reserves of the above-mentioned minerals. The rising demand for the minerals should translate into greater benefits rather than social and economic catastrophes. The emerging reality demands acceleration of the AMV implementation to address institutional, regulatory, fiscal and human capacity challenges. Because these new minerals are also mined by artisans, lack of regulation could increase the incidence of environmental pollution, child labour, and other social vices.



Again, competition for the resources are set to be on the rise. It is however important that competition leads to a strengthened bargaining power of African countries. Countries need to be assertive like the Latin American countries in negotiating with investors and dealing with the vices of mining, integrating the resource extraction into the rest of the economy, developing capacity and

planning the needed infrastructure for the efficient and effective exploitation of the resources.

The significant downside to the extraction of these minerals is that they are highly toxic, requiring improved handling, lest water bodies will be contaminated and risk of diseases will also rise.

## Why the Slow implementation of the AMV and what is required for quicker implementation

After almost a decade of adopting AMV by African heads of states, only Lesotho has successfully contextualised the vision. This is not encouraging for the ambitious target to transform the economies of resource rich countries and consequently the continent.

This is the result of the failure by the Heads of States of Africa to commit themselves to an aggressive roadmap for the adoption of the AMV into country laws. The demand driven approach led by the AMDC can only fit into the current snail-paced adoption of the vision.

Ownership of the CMV process by Heads of States is required to breathe urgency on mineral sector Ministers for a fast-paced adoption of the Vision. This should lead to defined roles and timelines for countries

to contextualise the AMV. Without that high-level intervention in the implementation of the AMV, the anticipated results from the mineral sector may take several decades to materialise.

## Conclusion

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The underlining factors that necessitated the AMV remains relevant today. The burst in mineral prices have imposed considerable economic hardship on African economies dependent on raw mineral exports.<sup>12</sup> IFFs from Africa are still growing at an alarming rate.<sup>13</sup> According to the latest report by Global Financial Integrity, IFFs from Sub-Saharan Africa ranged from 5.3 per cent to 9.9 per cent of total trade in 2014, a ratio higher than any other geographic region studied.<sup>14</sup> Issues of contract negotiation, unfair fiscal extraction arrangements, limited local content and diversification are significant concerns in Africa's natural resources sector. Presently, mineral-endowed African countries are under intense pressure to enter into unfair mining deals and contracts to hand out tax and non-tax incentives to mining corporations that undermine their fragile economies in the long-term. The situation could worsen with the emergent scramble for "new minerals", especially those that can be mined by artisans.

Eight years after its adoption very little progress has been achieved in domesticating the Africa Mining Vision at both national and regional levels. A thoughtful but speedy implementation of the AMV is critical to Africa's structural transformation. If the continent is to avoid the failures of the Millennium Development Goals

(MDGs) era and successfully transition from its present state to that foreseen by Agenda 2030, the Sustainable Development Goals (SDGs), then it must better harness the full potential and benefits of its vast mineral wealth through domestication of the shared mining vision.

Mineral resources are finite. Hence, they need to be managed in a manner that benefits current and future generations. The AMV's aim of enhancing transparency, equity and optimal development of mineral resources to underpin broad-based sustainable growth and socio-economic development in Africa is critical to addressing poverty, inequality and under-development on the continent. The framework's promotion of a sustainable and well-governed minerals sector that effectively garners and deploys resource rents and that is safe, healthy, gender and ethnically inclusive, environmentally friendly, socially responsible and appreciated by mine-affected communities are critical to Africa's progress in the 21st century.

The reality that only Lesotho has so far successfully contextualised the AMV is an indication that radical steps are needed to avoid further delays. African leaders must assume practical ownership to revive the vision from its sleepy state.

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<sup>12</sup> UNCTAD (2017), *Beyond austerity: Towards a global new deal*, Trade and Development Report. UNCTAD: Geneva. [http://unctad.org/en/PublicationsLibrary/tdr2017overview\\_en.pdf](http://unctad.org/en/PublicationsLibrary/tdr2017overview_en.pdf)

<sup>13</sup> Illicit Financial Flows (2015). Report of the High Level Panel on Illicit Flows from Africa. [https://www.uneca.org/sites/default/files/PublicationFiles/iff\\_main\\_report\\_26feb\\_en.pdf](https://www.uneca.org/sites/default/files/PublicationFiles/iff_main_report_26feb_en.pdf).

<sup>14</sup> Global Financial Integrity (2017). *Illicit Financial to and from Developing Countries: 2005-2014*, GFI, Washington D.C. [http://www.gfintegrity.org/wp-content/uploads/2017/05/GFI-IFF-Report-2017\\_final.pdf](http://www.gfintegrity.org/wp-content/uploads/2017/05/GFI-IFF-Report-2017_final.pdf).

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