



## BE RWANDA WISE · DOING BUSINESS IN RWANDA

The guide for foreign and Rwandan investors

### Chapter 10 of 11

# Minerals, Mining, Oil & Gas

Rwanda regulates mining and quarrying under a law of June 2024 that replaced the 2018 mining law, taxes mineral sales under a separate law of the same date that cut royalties and added a tax on raw exports, and licenses petroleum exploration under a 2016 law under which no exploration well has yet been reported. This chapter sets out the rules as they stand at 10 October 2026 for a foreign or Rwandan company that wants to explore, mine, process, trade or export minerals, open a quarry, bid for a block in one of the Rwanda Mines, Petroleum and Gas Board's competitive rounds, or invest in Lake Kivu methane, and for the buyers, lenders and acquirers who must diligence those businesses against traceability rules and sanctions.

---

Reviewed 10 October 2026. Prepared by a commercial lawyer with over 30 years' international experience. Legal and tax information, not legal advice. Rates, thresholds and procedures change: confirm anything important with the relevant authority or an advocate registered with the Rwanda Bar Association before you act. Laws are published in Kinyarwanda, English and French in the Official Gazette; check the official text before relying on a translation.

Read online, with live updates, links and Rwandabot: <https://bewiseapps.com/doing-business-in-rwanda/minerals-mining-oil-and-gas/>

© Be Wise Apps

# Contents

## **10** Chapter overview

---

### **10.1** The Mining Law 2024 and regulators

---

### **10.2** Mining and quarry licences

---

### **10.3** Mineral tax, royalties and fiscal terms

---

### **10.4** 3T, gold and traceability

---

### **10.5** Mining agreements, local content and community

---

### **10.6** Strategic minerals and regional deals

---

### **10.7** Petroleum and Lake Kivu methane

---

### **10.8** Sanctions, due diligence and reforms

---

Legal and tax information, not legal advice. Rates, thresholds and procedures change: confirm anything important with the relevant authority or an advocate registered with the Rwanda Bar Association before you act. Laws are published in Kinyarwanda, English and French in the Official Gazette; check the official text before relying on a translation.

# Minerals, Mining, Oil & Gas

Reviewed 10 October 2026 · Prepared by a commercial lawyer with over 30 years' international experience · Legal and tax information, not legal advice · [How we check](#) · [Open in the app](#)

## AT A GLANCE

### Governing law

- [Law N° 072/2024 of 26/06/2024 on mining and quarry operations \(Official Gazette n° Special of 24/07/2024\)](#)
- [Law N° 056/2024 of 26/06/2024 establishing tax on minerals \(Official Gazette n° Special of 05/07/2024\)](#)
- [Presidential Order N° 028/01 of 18/05/2023 governing Rwanda Mines, Petroleum and Gas Board](#)
- [Regulations of the Chief Executive Officer N° 001 to 007/MINES/RMB/2019 of 18/07/2019 \(rehabilitation guarantee, processing and trading licences, licence format and model agreements, mining areas, categorisation, applications, tenders and fees, samples, quarries\), still applied by RMB](#)
- [Law N° 13/2016 of 02/05/2016 governing petroleum exploration and production activities](#)
- [Law N° 85/2013 regulating petroleum and petroleum products trade in Rwanda](#)
- [Ministerial Order N° 003/MoE/25 of 19/08/2025 on environmental and social impact assessment \(cited as the legal basis of the ESIA steps on RDB's business procedures portal\)](#)

### Who you will deal with

- Rwanda Mines, Petroleum and Gas Board (RMB), supervised by the Office of the President: the "competent organ" of the Mining Law, which grants and renews mineral and quarry licences, approves transfers, runs the GIMCS licensing portal and the MCIS export certification system, inspects and imposes administrative sanctions
- Licensing Committee: assesses mining and quarry licence applications and advises RMB's Chief Executive Officer (Article 6 of Law N° 072/2024)
- Rwanda Revenue Authority (RRA): collects the mining royalty and the export tax under Law N° 056/2024, and receives licence holders' audited annual accounts with RMB
- Rwanda Development Board (RDB): the One Stop Center through which mining licence applications and responses pass, and the authority that issues environmental and social impact assessment certificates
- Districts and Sectors: receive applications for commercial and non-commercial small-scale quarry licences and agree community development plans with licence holders; the Rwanda Environment Management Authority (REMA) issues the final rehabilitation certificate
- Minister in charge of petroleum and the Rwanda Utilities Regulatory Authority (RURA): petroleum licences and agreements upstream, fuel trade, storage and pump prices downstream

## Key figures

|                                                        |                                                                                                                                                                |
|--------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Mining royalty (Law N° 056/2024)                       | <b>0.5% (gold) to 3% (base metals, including tin, tungsten and tantalum, and energy minerals) of norm value; gemstones 2% of gross value</b>                   |
| Extra tax on minerals exported in raw form             | <b>0.5% (gold) to 3% (gemstones) of norm value, paid before export</b>                                                                                         |
| Maximum block size                                     | <b>400 ha for exploration and large-scale mining; 100 ha medium-scale; 50 ha small-scale</b>                                                                   |
| Licence terms                                          | <b>Exploration up to 4 years, renewable once for up to 4; mining up to 15 years, renewable for up to 15 years each time</b>                                    |
| Local shareholding (Regulations N° 005/MINES/RMB/2019) | <b>Small-scale mines Rwandan-owned; medium-scale mines at least 40% Rwandan shareholders</b>                                                                   |
| Transfer of a mining licence or shares in its holder   | <b>Only after 30% of the pledged investment is spent; RMB approval within 60 days; 10% capital gains tax on licence transfers</b>                              |
| Trading with minerals of no proven origin              | <b>Administrative fine of 10% of their value and confiscation; trading illegally extracted minerals carries more than 5 and up to 10 years' imprisonment</b>   |
| Lake Kivu methane power in operation                   | <b>82.4 MW according to MININFRA's February 2025 Energy Policy (KivuWatt 26.4 MW; Shema Power Lake Kivu 56 MW net), 21.1% of installed generation capacity</b> |

## What changed in 2024–26

- 5 July 2024: Law N° 056/2024 came into force, replacing the 2013 minerals tax law, cutting the royalty from 4% to 3% on base metals and from 6% to 0.5% on gold, and adding an export tax on minerals exported in raw form.
- 24 July 2024: Law N° 072/2024 on mining and quarry operations came into force, repealing Law N° 58/2018, keeping its exploration, small-, medium- and large-scale mining, trading, processing and special radioactive minerals licences, and adding a power for the Government to take a free carried interest by Ministerial Order (Article 49).
- 17 March 2025 and 25 June 2026: the Council of the European Union listed Gasabo Gold Refinery in Kigali, which its announcement described as responsible for illegally importing gold from M23-controlled regions of the Democratic Republic of the Congo (DRC), and the then Chief Executive Officer of RMB; the United States Office of Foreign Assets Control (OFAC) then designated Gasabo Gold Refinery LTD, its chairman and general manager and three Rwandan mining companies, stating that the network worked with M23 to smuggle minerals from eastern DRC to Rwanda.
- May and December 2025: RMB opened its first two competitive rounds for mineral blocks through the Mining Investment Pitchbook, the second offering 10 blocks with a deadline of 3 March 2026.
- 4 December 2025: the Regional Economic Integration Framework between Rwanda and the DRC and a framework between the United States and Rwanda for shared economic prosperity were signed in Washington, both covering mineral supply chains.
- 14 September 2026: Almonty Industries and the Government announced a tungsten venture, 75% Almonty and 25% Government,

built on the Shyorongi exploration concession.

**Who this applies to.** Law N° 072/2024 contains no nationality rule: an exploration licence or a large-scale mining licence may be held by a Rwandan company owned entirely by foreigners, and the tax on minerals, the licence fees and the traceability duties are the same for every holder. The differences come from the 2019 RMB regulations that RMB still applies. Regulations N° 005/MINES/RMB/2019 require a small-scale mine to be owned by Rwandan nationals and a medium-scale mine to have at least 40% Rwandan shareholders, so a foreign investor in practice holds exploration and large-scale mining licences, or a minority in a medium-scale mine. A mineral trader, foreign or Rwandan, must show the Rwandan franc equivalent of USD 250,000 in a local bank. Applicants must be registered in Rwanda, as a company or a cooperative. Nationals of other East African Community (EAC) and Common Market for Eastern and Southern Africa (COMESA) states are treated as foreigners for the local shareholding rules, which refer to Rwandan citizens.

## Why resources need a chapter of their own

In most sectors a foreign investor asks whether the market is open and which licence the business needs. In mining there is a prior question, because the investor needs a grant of the resource itself. Article 3(a) of Law N° 072/2024 of 26/06/2024 on mining and quarry operations (the Mining Law) vests "all rights of ownership and control of minerals or quarry products in, under or upon any land in Rwanda" in the State "notwithstanding personal ownership of land", and Article 43 of Law N° 27/2021 of 10/06/2021 governing land says the same from the land side. Owning or leasing land in Rwanda therefore never carries a right to mine it. Minerals and quarry products are released through licences granted by the **Rwanda Mines, Petroleum and Gas Board (RMB)**; petroleum through a licence and an agreement with the Minister in charge of petroleum under Law N° 13/2016 of 02/05/2016. The ordinary company, investment, land, tax, employment and environmental rules apply on top of the resource grant, not instead of it.

Mining matters to Rwanda's economy out of proportion to its size. RDB reports mineral exports of USD 1.1 billion in 2023, against USD 373.4 million in 2017, and RMB counts more than 92,000 jobs in the sector and 52 target areas under exploration. Most production is of the "3T" minerals, tin (cassiterite), tantalum (coltan) and tungsten (wolframite), with gold, gemstones and, increasingly, lithium, beryllium and rare earths as exploration targets. Most of it comes from artisanal and small-scale operators, which shapes the licensing system, the local ownership rules and the traceability regime that every buyer will ask about.

## The law, the regulator and the gaps

The Mining Law came into force on publication in the Official Gazette on 24 July 2024 and repealed Law N° 58/2018 of 13/08/2018. Licences granted under the 2018 law remain valid until they expire (Article 75), but the Law does not expressly keep alive the instruments made under the 2018 law. RMB nonetheless continues to publish and apply the seven Regulations of its Chief Executive Officer of 18 July 2019, which supply the categorisation of mines, the application and tender procedure, the fees, the local shareholding rules, the model agreements and the rehabilitation guarantee. None of the new

Regulations, Prime Minister's Order or Ministerial Orders that the 2024 Law calls for had been published at 10 October 2026. The framework, the institutions and these gaps are set out in [The Mining Law 2024 and the regulators](#).

RMB was established by Presidential Order N° 028/01 of 18/05/2023 and is supervised by the Office of the President. It licenses, inspects and sanctions mineral, quarry, oil and gas activity, runs the Geological Information and Mining Cadastre System (GIMCS) through which licence applications are made, and issues export certificates through the Mineral Certification Information System (MCIS). The Rwanda Revenue Authority (RRA) collects the tax on minerals, the Rwanda Development Board (RDB) is the One Stop Center for applications and issues environmental impact certificates, and the Districts deal with small quarries and community plans.

## **Licences, tax and traceability**

Article 7 of the Mining Law provides for an exploration licence, small-, medium- and large-scale mining licences, a mineral trading licence and a mineral processing licence, Article 25 requires a special licence for radioactive minerals, and Article 28 adds three tiers of quarry licence. Exploration blocks may be up to 400 hectares and run for four years, renewable once for four; mining licences run for up to 15 years and may be renewed more than once. Any transfer of the licence, including any transfer of shares in the holder, needs RMB's prior written approval and is barred until 30% of the pledged investment has been spent. RMB has also begun offering blocks through competitive rounds. Licence types, procedure, fees, transfers and sanctions are in [Mining licences and quarry licences](#).

Law N° 056/2024 of 26/06/2024 establishing tax on minerals charges a mining royalty of 0.5% to 3% on every sale of minerals and, for minerals exported in raw form, a further export tax of 0.5% to 3%. The tax is withheld by the local processor or exporter, is not deductible for income tax, and sits alongside 28% corporate income tax, the 10% capital gains tax on licence and share transfers and the Investment Code incentives for exploration and value addition: see [Mineral tax, royalties and fiscal terms](#). Mineral exports need an export certificate issued by RMB through MCIS, and 3T minerals and gold move under the International Tin Supply Chain Initiative (iTSCi) tagging system and the Regional Certification Mechanism of the International Conference on the Great Lakes Region (ICGLR). Possessing or trading minerals without proof of origin is a fault and, where they were illegally extracted, a serious offence. These rules, and the foreign rules that make buyers demand them, are in [3T, gold and traceability](#).

## **Agreements, communities and the State's share**

RMB signs an agreement with each holder of an industrial mining or quarry licence to complete its rights and obligations (Article 73), on the model in Regulations N° 004/MINES/RMB/2019, which provides for arbitration at the Kigali International Arbitration Centre (KIAC) and for Rwandan employment and procurement commitments. Every holder must give preference to Rwandan contractors and goods where they are competitive (Article 72), agree a development and social welfare plan with the District (Article 74), carry out an environmental and social impact assessment before starting, keep a costed rehabilitation plan and lodge a rehabilitation guarantee. The Government may take shares on agreed terms (Article 48), and a mining licence "may entitle the government with free carried interest" on terms to be set by Ministerial Order (Article 49). These obligations are covered in [Mining agreements, local content and community](#).

## Strategic minerals, petroleum and methane, and sanctions

Article 3(d) of the Mining Law lets RMB designate strategic minerals reserved to the Government, a power not yet used. Rwanda's position in critical-mineral supply chains has been reshaped by the Washington process of 2025: the peace agreement between Rwanda and the DRC of 27 June 2025, the Regional Economic Integration Framework signed on 4 December 2025 and a framework with the United States signed the same day. These instruments, the commercial deals that followed and their limits are in [Strategic minerals and regional deals](#).

Oil and gas exploration in the Lake Kivu basin has produced seismic, gravity and magnetic data, but official updates report no exploration well (exploration rights granted to Vanoil Energy and later reported awarded to Ngali Mining did not lead to drilling), and the implementing orders of Law N° 13/2016 have not been made. Lake Kivu's dissolved methane, shared with the DRC, already fuels 82.4 MW of generating capacity, according to the Ministry of Infrastructure (MININFRA), without a dedicated statute. Upstream, methane and the downstream fuel trade regulated by RURA under Law N° 85/2013 are covered in [Petroleum and Lake Kivu methane](#). The European Union and United States sanctions of March 2025 and June 2026, the due diligence an acquirer, lender or buyer should run, and the reforms still awaited are in [Sanctions, due diligence and reforms](#).

## How to use this chapter

Begin with [The Mining Law 2024 and the regulators](#), which explains who owns minerals, which instruments are in force and which are still awaited, and which body decides what. An investor looking at a block, whether through a direct application or a competitive round, should then read [Mining licences and quarry licences](#) for licence types, sizes, terms, fees, the local shareholding rules and the transfer restrictions, and [Mineral tax, royalties and fiscal terms](#) to model the royalty, export tax and income tax. Anyone who buys, processes, finances or exports minerals should read [3T, gold and traceability with Sanctions, due diligence and reforms](#). Holders preparing for a mining agreement, an environmental impact assessment or closure should read [Mining agreements, local content and community](#); investors in lithium, tungsten or rare earths, or in projects with a regional angle, [Strategic minerals and regional deals](#); and energy investors [Petroleum and Lake Kivu methane](#).

Mining sits on the rest of the guide: the company must be registered in Rwanda ([Registering a company with RDB](#)), the land rules govern compensation and leases ([The Land Law and land tenure](#)), and the 10% capital gains tax applies on exit ([Capital gains, property and other taxes](#)). Each section ends with the related Be Rwanda Wise FAQs, the official sources and a question you can put to Rwandabot, the AI legal-information chatbot, about your own project. Figures are stated at 10 October 2026. Because the regulations, fee schedule, committee order and carried-interest order required by the 2024 Law are still awaited, and because sanctions designations can change without notice, check the position with RMB and against the official lists before relying on it for a later transaction ([FAQ 115](#)).

---

## OFFICIAL SOURCES

- Rwanda Mines, Petroleum and Gas Board: Law N° 072/2024 of 26/06/2024 on mining and quarry operations (Official Gazette n° Special of 24/07/2024) — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Laws/Law\\_n\\_\\_0722024of\\_26062024\\_on\\_mining\\_and\\_quarry\\_operations.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Laws/Law_n__0722024of_26062024_on_mining_and_quarry_operations.pdf)
- Rwanda Mines, Petroleum and Gas Board: Presidential Order N° 028/01 of 18/05/2023 governing RMB — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Laws/LAW\\_ESTABLISHING\\_RMB.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Laws/LAW_ESTABLISHING_RMB.pdf)
- Rwanda Mines, Petroleum and Gas Board: Regulations of the Chief Executive Officer N° 001 to 007/MINES/RMB/2019 of 18/07/2019 — <https://www.rmb.gov.rw/publications/regulations>
- Rwanda Mines, Petroleum and Gas Board: Ministerial Orders page (Ministerial Order N° 007/01 of 19/07/2019 and others) — <https://www.rmb.gov.rw/publications/ministerial-orders>
- Rwanda Mines, Petroleum and Gas Board: Sites and Apps (GIMCS and MCIS portals) — <https://www.rmb.gov.rw/sites-apps-1>
- Rwanda Development Board: business procedures portal, ESIA steps citing Ministerial Order N° 003/MoE/25 (shown within the special economic zone user licence procedure) — <https://businessprocedures.rdb.rw/procedure/print/188/step/0?showRecourses=true&showCertification=false&l=en&embed=true&includeSearch=false>
- Rwanda Mines, Petroleum and Gas Board: Regulations N° 005/MINES/RMB/2019 of 18/07/2019 on potential mining areas, categorisation of mines, applications, tenders and fees — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Regulations/Regulations\\_of\\_the\\_CEO\\_No\\_005.MINES.RMB.2019\\_of\\_18.07.2019\\_determining\\_potential\\_mining\\_areas\\_\\_criteria\\_for\\_categorisation\\_of\\_mines\\_\\_modalities\\_and\\_requirements\\_for\\_mineral\\_license\\_application\\_and\\_for\\_tenders.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Regulations/Regulations_of_the_CEO_No_005.MINES.RMB.2019_of_18.07.2019_determining_potential_mining_areas__criteria_for_categorisation_of_mines__modalities_and_requirements_for_mineral_license_application_and_for_tenders.pdf)
- Rwanda Mines, Petroleum and Gas Board: Regulations N° 003/MINES/RMB/2019 of 18/07/2019 on mineral processing and trading licences — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Regulations/Regulations\\_of\\_the\\_CEO\\_No\\_003.MINES.RMB.2019\\_of\\_18.07.2019\\_determining\\_the\\_content\\_of\\_mineral\\_processing\\_and\\_trading\\_licenses\\_and\\_modalities\\_of\\_their\\_granting.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Regulations/Regulations_of_the_CEO_No_003.MINES.RMB.2019_of_18.07.2019_determining_the_content_of_mineral_processing_and_trading_licenses_and_modalities_of_their_granting.pdf)
- Rwanda Mines, Petroleum and Gas Board: application form for small, medium and large-scale mining licences — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Guidelines/SMALL\\_SCALE\\_MEDIUM\\_SCALE\\_AND\\_LARGE\\_SCALE\\_MINING\\_LICENSE.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Guidelines/SMALL_SCALE_MEDIUM_SCALE_AND_LARGE_SCALE_MINING_LICENSE.pdf)
- Rwanda Mines, Petroleum and Gas Board: Annexes to the Rwanda Mining Investment Pitchbook (02/12/2025) — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Pitchbook/Annexes\\_for\\_Rwanda\\_Mining\\_Investment\\_Pitchbook\\_02.12.2025.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Pitchbook/Annexes_for_Rwanda_Mining_Investment_Pitchbook_02.12.2025.pdf)
- Rwanda Mines, Petroleum and Gas Board: a breakdown of the 10 mineral blocks now available to investors (3 December 2025) — <https://www.rmb.gov.rw/news-detail/a-breakdown-of-the-10-mineral-blocks-now-available-to-investors-1>
- Rwanda Revenue Authority: Law N° 056/2024 of 26/06/2024 establishing tax on minerals (Official Gazette n° Special of 05/07/2024) — [https://www.rra.gov.rw/fileadmin/user\\_upload/Tax\\_on\\_minerals\\_Law\\_of\\_2024.pdf](https://www.rra.gov.rw/fileadmin/user_upload/Tax_on_minerals_Law_of_2024.pdf)
- Rwanda Mines, Petroleum and Gas Board: Law N° 056/2024 establishing tax on minerals (RMB copy) — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Laws/Law\\_no\\_0562024of\\_26062024\\_establishing\\_tax\\_on\\_minerals.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Laws/Law_no_0562024of_26062024_establishing_tax_on_minerals.pdf)
- Rwanda Revenue Authority: Tax on minerals reduced (2024 news release on the new rates) — [https://www.rra.gov.rw/en/details?tx\\_news\\_pi1%5Baction%5D=detail&tx\\_news\\_pi1%5Bcontroller%5D=News&tx\\_news\\_pi1%5Bnews%5D=2149&cHash=9f1c25f70d8de2c6d159c0e762114e0f](https://www.rra.gov.rw/en/details?tx_news_pi1%5Baction%5D=detail&tx_news_pi1%5Bcontroller%5D=News&tx_news_pi1%5Bnews%5D=2149&cHash=9f1c25f70d8de2c6d159c0e762114e0f)
- Rwanda Revenue Authority: Law N° 027/2022 of 20/10/2022 establishing taxes on income — [https://www.rra.gov.rw/fileadmin/user\\_upload/Income\\_Tax\\_law\\_of\\_2022.pdf](https://www.rra.gov.rw/fileadmin/user_upload/Income_Tax_law_of_2022.pdf)
- Capital Market Authority: Law N° 006/2021 of 05/02/2021 on Investment Promotion and Facilitation, with Annex on incentives — [https://cma.rw/fileadmin/user\\_upload/Investment-code-2021.pdf](https://cma.rw/fileadmin/user_upload/Investment-code-2021.pdf)

- Rwanda Revenue Authority: Commissioner General Guidelines for the Implementation of the VAT Deferral Facility (in force 1 August 2026) — [https://www.rra.gov.rw/fileadmin/Folder\\_for\\_2025/CG\\_\\_s\\_Guidelines\\_For\\_Implementation\\_of\\_VAT-July\\_2026.pdf](https://www.rra.gov.rw/fileadmin/Folder_for_2025/CG__s_Guidelines_For_Implementation_of_VAT-July_2026.pdf)
- Ministry of Justice: Official Gazette n° Special of 29/05/2025 (Law N° 014/2025 amending the income tax law, capital gains on licences) — <https://www.minijust.gov.rw/index.php?elD=dumpFile&t=f&f=130496&token=4b9d4de9658212b7aaeeb5c8a42c823a7b879d7b>
- Rwanda Mines, Petroleum and Gas Board: Mineral traceability (iTSCi, RCS Global, tags and logbooks) — <https://www.rmb.gov.rw/1/mineral-traceability>
- US Department of the Treasury: OFAC designations of Gasabo Gold Refinery and Rwandan mining companies (25 June 2026) — <https://home.treasury.gov/news/press-releases/sb0543>
- Council of the European Union: DRC sanctions listings, including Gasabo Gold Refinery (17 March 2025) — <https://www.consilium.europa.eu/en/press/press-releases/2025/03/17/democratic-republic-of-the-congo-eu-lists-further-nine-individuals-and-one-entity/>
- European Commission: Conflict Minerals Regulation (EU) 2017/821 — [https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation\\_en](https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation_en)
- Rwanda Mines, Petroleum and Gas Board: Regulations of the CEO N° 004/MINES/RMB/2019 of 18/07/2019 (format of mineral licences and model agreements), Official Gazette n° 29 bis of 29/07/2019 — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Regulations/Regulations\\_of\\_the\\_CEO\\_No\\_004.MINES.RMB.2019\\_of\\_18.07.2019\\_determining\\_the\\_format\\_and\\_content\\_of\\_a\\_mineral\\_license\\_and\\_the\\_content\\_of\\_an\\_agreement\\_with\\_a\\_minining\\_or\\_industrial\\_quarry\\_license\\_holder.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Regulations/Regulations_of_the_CEO_No_004.MINES.RMB.2019_of_18.07.2019_determining_the_format_and_content_of_a_mineral_license_and_the_content_of_an_agreement_with_a_minining_or_industrial_quarry_license_holder.pdf)
- Rwanda Mines, Petroleum and Gas Board: Regulations of the CEO N° 001/MINES/RMB/2019 of 18/07/2019 determining the nature, amount and deposit of environmental rehabilitation guarantee — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Regulations/Regulations\\_of\\_the\\_CEO\\_No\\_001.MINES.RMB.2019\\_of\\_18.07.2019\\_determining\\_the\\_nature\\_\\_amount\\_and\\_deposit\\_of\\_environmental\\_rehabilitation\\_guarantee.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Regulations/Regulations_of_the_CEO_No_001.MINES.RMB.2019_of_18.07.2019_determining_the_nature__amount_and_deposit_of_environmental_rehabilitation_guarantee.pdf)
- Rwanda Mines, Petroleum and Gas Board: Guidelines and standards (mining licence application form, Mining Safety Standards) — <https://www.rmb.gov.rw/publications/guidelines>
- United States Department of State release: Regional Economic Integration Framework between the Democratic Republic of the Congo and Rwanda, signed 4 December 2025 (text as published by allAfrica) — <https://allafrica.com/stories/202512040547.html>
- Rwanda Development Board: Mining investment opportunities — <https://rdb.rw/investment-opportunities/mining/>
- US Department of the Treasury: Treasury Sanctions Rwanda Officials (press release sb0411, 2 March 2026) — <https://home.treasury.gov/news/press-releases/sb0411>
- Rwanda Mines, Petroleum and Gas Board: Law N° 13/2016 of 02/05/2016 governing petroleum exploration and production activities, Official Gazette n° 21 of 23/05/2016 — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Laws/Petroleum\\_Law\\_230628\\_221132.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Laws/Petroleum_Law_230628_221132.pdf)
- Rwanda Mines, Petroleum and Gas Board: Oil and gas — <https://www.rmb.gov.rw/oilandgas>
- Rwanda Utilities Regulatory Authority: Gas sub-sector (Lake Kivu methane) and downstream petroleum — <https://www.rura.rw/sectors/energy/sub-sectors-and-services/gas>
- RwandaLII: Law N° 85/2013 regulating petroleum and petroleum products trade in Rwanda, Official Gazette n° 46 of 18/11/2013 — <https://rwandalii.org/akn/rw/act/law/2013/85/eng@2013-11-18>
- Rwanda Energy Group: Methane gas power generation — <https://www.reg.rw/what-we-do/generation/methane-gas/>
- Rwanda Mines, Petroleum and Gas Board: petroleum and gas exploration — <https://www.rmb.gov.rw/>
- Offshore magazine: Vanoil extends offshore Rwanda PSC talks (31 January 2013) — <https://www.offshore-mag.com/home/article/16773438/vanoil-extends-offshore-rwanda-psc-talks>
- Africa Energy Intelligence: Rwanda, Vanoil pulls out of Lake Kivu exploration (4 February 2014) — <https://www.africa-energy.com/news-centre/article/rwanda-vanoil-pulls-out-lake-kivu-exploration>

- The EastAfrican: Rwandan firm wins bid to search for oil in Lake Kivu (8 February 2017) — <https://www.theeastafrican.co.ke/tea/business/rwandan-firm-wins-bid-to-search-for-oil-in-lake-kivu-1361524>
- The EastAfrican: Rwanda pauses oil exploration in Kivu (22 October 2018) — <https://www.theeastafrican.co.ke/business/Rwanda-pauses-oil-exploration-in-Kivu/2560-4816542-br4flbz/index.html>
- KT Press: Rwanda Mines, Petroleum and Gas Board on 13 prospective structures in Lake Kivu (15 January 2025) — <https://www.ktpress.rw/2025/01/rwanda-mines-and-petroleum-board-says-13-oil-wells-identified-in-lake-kivu/>
- Rwanda Environment Management Authority: Lake Kivu monitoring — <https://www.rema.gov.rw/our-work/lake-kivu-monitoring>
- Rwanda Environment Management Authority: Environment Analytics and Lake Kivu Monitoring Division — <https://www.rema.gov.rw/about/departments/environment-analytics-and-lake-kivu-monitoring-division>
- OFAC: Recent actions of 25 June 2026 (SDN List additions, DRC programme) — <https://ofac.treasury.gov/recent-actions/20260625>
- National Bank of Rwanda: Law N° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction — [https://www.bnr.rw/documents/2025\\_AMLCFT\\_LAW.pdf](https://www.bnr.rw/documents/2025_AMLCFT_LAW.pdf)

## The Mining Law 2024 and the regulators: Law N° 072/2024 on mining and quarry operations, State ownership of minerals under Article 3(a), the landowner's rights under Article 4, strategic minerals, the Rwanda Mines, Petroleum and Gas Board, the Licensing Committee, RDB, RRA, REMA and the Districts, and the 2019 regulations still applied

Reviewed 10 October 2026 · Prepared by a commercial lawyer with over 30 years' international experience · Legal and tax information, not legal advice · [How we check](#) · [Open in the app](#)

### WHAT YOU NEED TO KNOW

- Law N° 072/2024 of 26/06/2024 on mining and quarry operations came into force on publication in the Official Gazette n° Special of 24/07/2024, repealed Law N° 58/2018 of 13/08/2018 (Article 77) and keeps licences granted under the 2018 law valid until they expire (Article 75).
- Under Article 3(a) of Law N° 072/2024 all rights of ownership and control of minerals and quarry products in, under or upon any land in Rwanda are vested in the State notwithstanding private ownership of the land, and under Article 3(d) the Rwanda Mines, Petroleum and Gas Board (RMB) may designate strategic minerals reserved to the Government, a power not used at 10 October 2026.
- Article 4 of Law N° 072/2024 requires a mining licence holder to give the landowner or lawful occupier fair compensation before mining starts, after which the land is registered to the State, while an exploration or quarry licence holder must sign a written lease and hand the land back when operations end.
- RMB, governed by Presidential Order N° 028/01 of 18/05/2023 and supervised by the Office of the President, grants mineral and quarry licences on the advice of the Licensing Committee established by Article 6 of Law N° 072/2024, with applications and responses passing through the One Stop Center of the Rwanda Development Board (RDB) (Article 9).
- At 10 October 2026 none of the regulations, Prime Minister's Order or Ministerial Orders called for by Law N° 072/2024 had been published, and RMB continues to apply Regulations of its Chief Executive Officer N° 001 to 007/MINES/RMB/2019 of 18/07/2019, made under the repealed 2018 law.

## One law for mines and quarries since 24 July 2024

Mining and quarrying in Rwanda are governed by **Law N° 072/2024 of 26/06/2024 on mining and quarry operations** (the Mining Law). The Chamber of Deputies adopted it at its sitting of 7 June 2024, and it was published in the Official Gazette n° Special of 24/07/2024. Under Article 78 it came into force on the date of publication, **24 July 2024**. Article 77 repealed Law N° 58/2018 of 13/08/2018 on

mining and quarry operations, and Article 75 provides that a mining or quarry licence granted under the 2018 law "remains valid until its expiration". A licence issued before July 2024 therefore keeps its original term, but its holder is now subject to the obligations and sanctions of the 2024 Law. Article 76 records that the Law was drafted, considered and adopted in Kinyarwanda, so the Kinyarwanda text is the reference version where the English and French texts in the same Gazette diverge.

The Law has 78 articles in ten chapters, from licences (Articles 7 to 37) through environment, health and safety (38 to 43), finance (44 to 49), faults and offences (50 to 70) to local procurement, agreements and community contributions (71 to 74). It is a framework law that leaves much of the detail to implementing instruments, most of which are still awaited. Article 2 sets the scope through its definitions. **Minerals** are substances extracted from the soil that can be processed to increase their economic value, metallic or non-metallic, "with the exception of hydrocarbons and water"; oil and gas fall under Law N° 13/2016 of 02/05/2016 governing petroleum exploration and production activities instead (Petroleum and Lake Kivu methane). **Radioactive minerals** are those containing by weight at least 0.05% of uranium or thorium, or both. **Mining operations** means activities designed to explore, extract, process or trade minerals, so a trader or a smelter is as much within the Law as a miner. **Quarry operations** means extracting, processing or trading geological materials used in works for their physical and chemical properties, such as stone, sand and clay. A **controlling interest** is the direct or indirect ability to hold more than 50% of the power to direct management or a majority holding, which matters for transfers of licences held by public companies (Article 16(4)). A **person** includes an individual, a company, a cooperative, a subsidiary and a partnership. The **competent organ** is "a State organ in charge of mine and quarry", which is RMB.

## Who owns the minerals: Article 3

Article 3 sets seven general principles. The first, in **Article 3(a)**, is that "all rights of ownership and control of minerals or quarry products in, under or upon any land in Rwanda are vested in the State notwithstanding personal ownership of land and other properties thereof". Article 43 of Law N° 27/2021 of 10/06/2021 governing land confirms the position from the land side (The Land Law and land tenure). Some commentaries and the Be Rwanda Wise FAQ on the point cite Article 4 for State ownership; the correct reference is Article 3(a), and Article 4 deals with the rights of the landowner in a licensed area.

Articles 3(b) and 3(c) draw the practical consequence: mining operations and quarry operations may be carried out only by a person holding a licence under the Law. Ownership of the surface, a freehold title, an emphyteutic lease or a land concession gives no right to extract even a small quantity of minerals or quarry products for sale. The Law backs this with criminal offences that reach the landowner as well as the miner. A person who allows a person without a licence to carry on mining activity on his or her land commits an offence punishable by one to two years' imprisonment and a fine of RWF 25,000,000 to RWF 50,000,000, or one of these penalties; a company faces a fine of RWF 60,000,000 to RWF 80,000,000 and may be dissolved (Article 66). Allowing unlicensed quarrying carries two to six months and RWF 1,000,000 to RWF 3,000,000, or RWF 4,000,000 to RWF 6,000,000 for a company (Article 69).

Two further principles reserve resources to the State. Under **Article 3(d)** the competent organ "may designate certain strategic minerals for which the Government exercises exclusive rights in the public interest", and under **Article 3(e)** it may designate quarries for exclusive exploitation by the Government for public-interest projects. No designation of strategic minerals had been published at 10 October

2026, but the power exists and could be used for lithium, rare earths or another mineral whose value rises; it is discussed in [Strategic minerals and regional deals](#). The remaining principles require social welfare, environmental protection and gender equality (Articles 3(f) and 3(g)).

## The landowner in a licensed area: Article 4

Because the State owns the minerals but not necessarily the land, Article 4 reconciles the two. The landowner or other lawful occupier keeps "full rights on that land in accordance with the relevant legislation" (Article 4(1)). Where a mineral deposit is discovered on any land, the licence holder must, **before it starts mining operations**, provide the landowner or lawful occupier with **fair compensation** (Article 4(2)), and once it has done so "the acquired land is registered to the State" (Article 4(3)). The mining company does not become the owner of the land; the State does, and the company works it under its licence.

Exploration and quarrying are treated differently. Where land is subject to an exploration or quarry licence, the holder concludes a **written lease contract** with the landowner or lawful occupier, and the land is handed back to the owner when exploration or quarrying is completed (Article 4(4)). The quarry holder also pays leasing fees and compensation for damage to land and other property (Article 34(b)), and a mining licence holder must compensate fairly for damage to land and property caused by its operations (Article 24(1)(j)). An exploration company therefore negotiates leases, not purchases.

The Mining Law speaks only of "fair compensation". It does not say how the amount is fixed, who values the land or what happens if the landowner refuses the offer, and it does not refer expressly to Law N° 32/2015 of 11/06/2015 relating to expropriation in the public interest. Earlier commentary, including Be Rwanda Wise FAQ 102 and FAQ 113, describes the compensation as paid "under the expropriation law"; the 2024 text does not say so, although the expropriation law lists minerals and other natural resources in the public domain among activities of public interest. In practice an investor should value the land with a certified valuer, record the agreement in writing, and expect the District to be involved; the procedure where agreement fails is in [Expropriation and compensation](#). Compensation, resettlement and the community development plan required by Article 74 are covered in [Mining agreements, local content and community](#).

### Who does what in Rwandan mining at 10 October 2026

| Body                                               | Legal basis                                                                         | Role                                                                                                                                                                                                                                                                                                   |
|----------------------------------------------------|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Rwanda Mines, Petroleum and Gas Board (RMB)        | Presidential Order N° 028/01 of 18/05/2023; Law N° 072/2024 (the "competent organ") | Grants, renews and approves the transfer of mineral and quarry licences; demarcates potential mining areas; runs competitive rounds; inspects; imposes administrative fines, suspension and cancellation; issues export certificates; sets grade, value and processing charges for the tax on minerals |
| RMB Chief Executive Officer and Board of Directors | Regulations N° 005/ MINES/RMB/2019, Articles 11 to 13                               | The Chief Executive Officer decides applications; a refused applicant may ask the Board to review the decision within 15 days                                                                                                                                                                          |

| Body                                           | Legal basis                                                                                            | Role                                                                                                                                                                                             |
|------------------------------------------------|--------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Licensing Committee                            | Article 6 of Law N° 072/2024; Prime Minister's Order N° 079/03 of 26/07/2019 (made under the 2018 law) | Assesses applications for mining and quarry licences and advises RMB; also handles licence disputes                                                                                              |
| Rwanda Development Board (RDB)                 | Article 9(2) of Law N° 072/2024; Ministerial Order N° 003/MoE/25 of 19/08/2025                         | One Stop Center through which mining licence applications and responses pass; issues environmental and social impact assessment certificates; company registration                               |
| Rwanda Revenue Authority (RRA)                 | Law N° 056/2024; Article 44 of Law N° 072/2024                                                         | Collects the mining royalty and export tax; receives the holder's audited annual financial statements; issues tax clearance certificates required for applications, transfers and relinquishment |
| Rwanda Environment Management Authority (REMA) | Article 40(2) of Law N° 072/2024                                                                       | Issues the final rehabilitation certificate that ends the holder's environmental liability                                                                                                       |
| Districts and Sectors                          | Articles 29 and 74 of Law N° 072/2024                                                                  | Receive applications for commercial small-scale quarry licences (District) and non-commercial small-scale quarry licences (Sector); agree the holder's development and social welfare plan       |
| Minister in charge of internal security        | Article 43 of Law N° 072/2024                                                                          | Authorises the import, transport, trade and use of dynamites on RMB's recommendation                                                                                                             |
| Minister in charge of Government investment    | Article 49 of Law N° 072/2024                                                                          | Is to determine by Order the Government's free carried interest in mining licences (Order not yet published)                                                                                     |

## The Rwanda Mines, Petroleum and Gas Board

RMB is governed by **Presidential Order N° 028/01 of 18/05/2023**, published in the Official Gazette n° Special of 25/05/2023. Article 3 of the Order places it under the supervision of the **Office of the President**, to which its Board of Directors submits an activity report every quarter (Article 10) and its Board chair sends the minutes of Board meetings (Article 12). Its mission is to regulate and manage minerals, quarries, oil and gas: it explores for resources itself, licenses and monitors exploration, mining, processing and trading and oil and gas activities, inspects licensees, imposes administrative sanctions and facilitates the amicable settlement of disputes in the sector.

In day-to-day dealings an investor meets RMB through its online systems. The **Geological Information and Mining Cadastre System (GIMCS)** external portal is used to apply for mining and quarry licences, for recommendations for blasting materials and for mineral sample permits; RMB and District staff process the same files on the internal side of the system. The **Mineral Certification Information System (MCIS)** is used by companies allowed to export minerals to apply for Mineral Export Certificates and ICGLR Mineral Export Certificates, and a mobile application lets a buyer verify that a printed certificate matches the record in MCIS.

Leadership has changed twice since 2025. In March 2025 the European Union listed RMB's then Chief Executive Officer, Francis Kamanzi, in its sanctions regime for the DRC, which is discussed in [Sanctions, due diligence and reforms](#); a new Chief Executive Officer, Alice Uwase, was reported appointed in July 2025, and RMB announced on 5 March 2026 that the Cabinet had appointed, on 4 March 2026, a head of department for mines, petroleum and gas exploration and three division managers, including one for Mining Cadastre and Digital Information. Investors should address correspondence to the institution, through GIMCS or RMB's published addresses, rather than to named officials.

## The Licensing Committee, RDB and the other bodies

Article 6 of the Mining Law establishes a committee in charge of assessing applications for mining and quarry licences, and Article 11(2) requires RMB to consider its recommendation before granting a mining licence. Article 6(2) requires a Prime Minister's Order on the Committee's structure, membership and functioning. No such Order had been published at 10 October 2026, and RMB lists Prime Minister's Order N° 079/03 of 26/07/2019, made under the 2018 law, which set up a committee to assess licence applications and handle disputes in mining and quarry operations. The annexes to RMB's December 2025 invitation to apply for mineral blocks state that, after evaluation, the evaluating committee submits its report to the licensing committee for further evaluation and onward submission to the Chief Executive Officer; investors should expect that two-tier review.

Article 9(2) requires that an application for a mining licence and the response to it are transmitted **through the One Stop Center**, the RDB service that gathers the permits an investor needs. In practice the application is lodged on GIMCS, and an investor registered with RDB under Law N° 006/2021 of 05/02/2021 on Investment Promotion and Facilitation can ask its RDB account manager to follow the file ([Sectors open to foreign investors and licensing](#)). RDB also issues the environmental and social impact assessment certificate that every exploration, mining, processing and commercial or industrial quarry licence holder needs before operations start (Article 38), under Ministerial Order N° 003/MoE/25 of 19/08/2025, and REMA issues the final rehabilitation certificate (Article 40(2)).

## Which implementing rules apply: the 2019 regulations

The Mining Law leaves much of the detail to **regulations of the competent organ**, a Prime Minister's Order and two Ministerial Orders, listed in the table below. At 10 October 2026 none of these instruments made under the 2024 Law appeared on RMB's pages of laws, regulations and orders. RMB continues to publish and apply the seven **Regulations of the Chief Executive Officer N° 001 to 007/ MINES/RMB/2019 of 18/07/2019**, published in the Official Gazette n° 29 bis of 29/07/2019: N° 001 on the environmental rehabilitation guarantee, N° 002 on services in mining and quarry operations, N° 003 on processing and trading licences, N° 004 on the format of licences and the model agreements, N° 005 on potential mining areas, categorisation of mines, applications and tenders, N° 006 on samples, and N° 007 on quarries. Its December 2025 invitation for mineral blocks expressly required applications "as per" Regulations N° 005/MINES/RMB/2019. The legal footing is uncertain, because those Regulations were made under the 2018 law and Article 75 of the 2024 Law preserves only licences, not implementing instruments. The guide therefore describes their rules as rules "under 2019 RMB

regulations still applied by RMB". An investor who plans around them should obtain RMB's written confirmation that they apply to its file, particularly for the local shareholding rules, the fees and the licence durations, which come from them and not from the Law.

Three conflicts need watching. Regulations N° 005/MINES/RMB/2019 give a medium-scale mine a licence term of ten years and a small-scale mine five years, while Article 13 of the 2024 Law allows any mining licence up to fifteen years based on the feasibility study; the Regulations require quarterly reports (Article 35) where the Law requires six-monthly ones (Articles 22 and 24); and Article 14 of the Regulations requires a renewal application "at least ninety (90) days before the expiration of the licence", while Article 14(3) of the Law requires a mining licence renewal application "within a period not exceeding 90 days before the expiration", so the two texts meet only on the 90th day before expiry and the filing date should be agreed with RMB in writing. Where a regulation conflicts with the Law, the Law prevails, but RMB fixes the actual term in the licence. Ministerial Regulations N° 002/2012/MINIRENA on the regional certification mechanism are discussed in [3T, gold and traceability](#).

### Instruments required by Law N° 072/2024 and what fills the gap at 10 October 2026

| Article of the 2024 Law      | Instrument required                                               | What RMB applies meanwhile                                                                           |
|------------------------------|-------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|
| Article 5(2)                 | Regulations naming potential mining areas and conditions          | Regulations N° 005/MINES/RMB/2019, Articles 3 to 6 (annual list on RMB's website)                    |
| Article 6(2)                 | Prime Minister's Order on the Licensing Committee                 | Prime Minister's Order N° 079/03 of 26/07/2019                                                       |
| Articles 7(2), 9(3), 10(2)   | Regulations on categorisation, applications and open competition  | Regulations N° 005/MINES/RMB/2019, Articles 7 to 29; pitchbook instructions of May and December 2025 |
| Articles 11(3), 73(2)        | Regulations on licence format and agreement content               | Regulations N° 004/MINES/RMB/2019 (model agreements with KIAC arbitration)                           |
| Articles 19(2), 20(2)        | Regulations on processing and trading licences                    | Regulations N° 003/MINES/RMB/2019                                                                    |
| Articles 28(2), 29(4), 31(2) | Regulations on quarry categories and applications                 | Regulations N° 007/MINES/RMB/2019                                                                    |
| Article 41(2)                | Regulations on the rehabilitation guarantee                       | Regulations N° 001/MINES/RMB/2019                                                                    |
| Article 43(3)                | Order of the Minister in charge of internal security on dynamites | Ministerial Order N° 013/MOJ/AG/19 of 16/07/2019                                                     |
| Article 47                   | Regulations setting service fees                                  | Fee chapters of Regulations N° 005 and N° 003/MINES/RMB/2019                                         |
| Article 49(2)                | Ministerial Order on the Government's free carried interest       | None: no carried interest can be fixed until the Order is made                                       |

| Article of the 2024 Law | Instrument required                          | What RMB applies meanwhile        |
|-------------------------|----------------------------------------------|-----------------------------------|
| Article 71              | Regulations on services by private operators | Regulations N° 002/MINES/RMB/2019 |

## Faults, offences and the sanctions ladder

The Law distinguishes **administrative faults**, sanctioned by RMB (Articles 50 to 62), from **criminal offences**, tried by the courts (Articles 63 to 70). Faults are graduated. Minor reporting and site breaches, such as late or false reports, keeping documents away from the site, suspending work without notice or failing to fix boundaries, attract a fixed administrative fine of RWF 500,000 for a mining licence holder (Article 51) and RWF 300,000 for a quarry licence holder (Article 56). Failing to pay sums due, refusing access to inspectors, or failing to insure, properly pay or equip employees leads to **provisional suspension** (Articles 52 and 57). Failing without cause to start work on time, persistent non-payment, breach of licence terms or of a suspension decision, and an unlawful transfer lead to **cancellation** (Articles 53 and 58), after which the holder has 90 days to rehabilitate the site and clear its liabilities (Article 37). The licence-level sanctions are tabulated in [Mining licences and quarry licences](#).

Among the criminal offences, mining without a licence carries two to five years' imprisonment and a fine of RWF 25,000,000 to RWF 50,000,000, or one of these penalties, and a legal person faces RWF 60,000,000 to RWF 80,000,000 and possible dissolution, with confiscation of the minerals and reinstatement of the site (Article 63). The offences of possessing and trading illegally extracted minerals are covered in [3T, gold and traceability](#). RMB's decisions may be challenged within RMB and then in court ([Regulatory, tax and public law disputes](#)).

### DECISION GUIDE

#### Does the Mining Law apply to your activity?

A first sort of a proposed activity under Law N° 072/2024. It does not replace a check of the licence conditions with RMB.

#### Q1 Is the substance crude oil, natural gas or water?

**Yes**

Outside the Mining Law, which excludes hydrocarbons and water (Article 2). Petroleum falls under Law N° 13/2016 and downstream fuel trade under Law N° 85/2013; see Petroleum and Lake Kivu methane.

**No**

Continue: minerals and quarry products are within the Law.

**Q2 Is the material stone, sand, clay or other geological material used in works for its physical or chemical properties?**

**Yes** Quarry operations: a non-commercial small-scale, commercial small-scale or industrial quarry licence from the Sector, the District or RMB (Articles 28 and 29).

**No** Mining operations: continue.

**Q3 Does the material contain at least 0.05% uranium or thorium by weight?**

**Yes** Radioactive minerals: a special licence from RMB for any exploration, mining, processing, possession, transport, import or export, with a monthly report in the first week of each month (Article 25).

**No** Continue.

**Q4 Will you only search for deposits, with drilling, trenching and sampling?**

**Yes** Exploration licence of up to 400 ha per block and up to four years, with a written lease from each landowner (Articles 4, 8 and 13).

**No** Continue.

**Q5 Will you extract minerals from the ground?**

**Yes** Small-, medium- or large-scale mining licence, with fair compensation to the landowner before mining starts (Articles 4 and 7).

**No** Continue.

**Q6 Will you buy, sell, export, smelt, refine, cut or polish minerals extracted by others?**

**Yes** Mineral trading licence or mineral processing licence (Articles 19 and 20), and proof of origin for every lot (Article 50).

**No** If the activity is a service to licence holders, such as drilling or assaying, check Regulations N° 002/MINES/RMB/2019 on service providers with RMB.

## First checks before committing to a Rwandan mining project

What a foreign or Rwandan investor should establish in the first weeks, before signing a term sheet for a licence, a joint venture or an acquisition.

☐ **Licence status on GIMCS**

Licence type, number, holder, coordinates, grant date and expiry, and whether it was granted under the 2018 law and is therefore running out its original term under Article 75.

☐ **Area availability**

Whether the target ground is free or covered by another licence of the same type (Article 12), and whether RMB lists it in a competitive round.

☐ **Which rules RMB will apply**

Written confirmation from RMB of the regulations, fees, term and local shareholding rules it will apply to the file while the 2024 instruments are awaited.

☐ **Land**

Who owns or occupies the surface, whether leases or compensation agreements exist, and whether any land has already been registered to the State under Article 4(3).

☐ **Environmental approvals**

The environmental and social impact assessment certificate from RDB, the rehabilitation plan and budget, and the guarantee lodged with the National Fund for Environment.

☐ **Sanctions exposure**

Screening of the holder, its shareholders, buyers and refiners against the European Union and OFAC lists, which have included Rwandan mining companies since 2025.

## WORKED EXAMPLE

### Mapping the statutory clock for a foreign-owned tin exploration project

A Rwandan subsidiary of an Australian company lodges a complete application on GIMCS for an exploration licence over one 400 ha block in the Western Province on 2 November 2026. RMB grants the licence on 15 January 2027 for four years. A tin deposit is found in year three. Dates are illustrative and assume RMB uses the full time allowed.

|                                          |                                                                                                                                                                                                                                                                                                                               |
|------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Decision on the application</b>       | Within 90 days of a complete file (Regulations N° 005/MINES/RMB/2019, Article 12): 2 November 2026 + 90 days = 31 January 2027. The grant on 15 January 2027 is within time. Had it been refused, a request for Board review would have been due within 15 days of notification.                                              |
| <b>Start of exploration</b>              | Within 90 days of issue (Article 22(a)): 15 January 2027 + 90 days = 15 April 2027. Before starting, the company needs its environmental and social impact assessment report approved (Article 38) and written leases with each landowner (Article 4(4)).                                                                     |
| <b>Recurring reports</b>                 | A progress report every six months (Article 22(b)); an audited statement of exploration expenditure within 90 days after each anniversary of issue (Article 22(f)), the first by 14 April 2028; audited IFRS accounts to RMB and RRA within three months of each financial year end (Article 44).                             |
| <b>Expiry and the mining application</b> | The licence expires on 14 January 2031. The company has the primary right to a mining licence over the discovery and applies within the 90 days before expiry (Article 21), that is from 16 October 2030. If RMB has not decided by 14 January 2031, exploration may continue until the decision is notified (Article 21(3)). |
| <b>If mining is refused</b>              | The company receives 90 days' notice to close (Article 21(4)) and must remove temporary buildings within 90 days and make boreholes safe (Article 22(i) and (j)).                                                                                                                                                             |

#### Records

If the company lets the licence lapse without applying for renewal or for a mining licence within two years, all records and reports of the exploration become the property of the State (Article 27(2)).

The company could instead apply in 2030 to renew the exploration licence once for up to four years, possibly giving up part of the area (Article 14(2)).

Fees for this licence are worked through in Mining licences and quarry licences.

## Questions investors ask about the Mining Law and the regulators

### Which law governs mining in Rwanda in 2026?

Law N° 072/2024 of 26/06/2024 on mining and quarry operations, in force since its publication on 24 July 2024. It repealed Law N° 58/2018 but keeps licences granted under that law valid until they expire. Mineral taxation is in the separate Law N° 056/2024 establishing tax on minerals, and petroleum in Law N° 13/2016.

### Who owns minerals found under private land in Rwanda?

The State. Article 3(a) of Law N° 072/2024 vests all rights of ownership and control of minerals and quarry products in, under or upon any land in the State, whatever the ownership of the land, and Article 43 of the Land Law confirms it. A landowner needs a licence to mine, and allowing unlicensed mining on one's land is an offence.

### Must a mining company compensate the landowner?

Yes. Under Article 4 of Law N° 072/2024 a mining licence holder gives the landowner or lawful occupier fair compensation before mining starts, and the land is then registered to the State. An exploration or quarry holder signs a written lease instead and returns the land when operations end. The Law does not set a valuation method.

### Who regulates mining in Rwanda?

The Rwanda Mines, Petroleum and Gas Board (RMB), governed by Presidential Order N° 028/01 of 18/05/2023 and supervised by the Office of the President. It grants, renews and approves transfers of licences on the advice of the Licensing Committee, inspects and sanctions licence holders, and issues export certificates through its MCIS system.

### Are the 2019 RMB regulations still in force after the 2024 Mining Law?

RMB still publishes and applies Regulations N° 001 to 007/MINES/RMB/2019, and cited Regulations N° 005 in its December 2025 call for blocks. The 2024 Law saves only existing licences, not regulations, and no replacement regulations had been published at 10 October 2026, so investors should obtain RMB's written confirmation of the rules applied to their file.

## THE 2027 HORIZON

- The implementing regulations required by Law N° 072/2024 on categorisation, applications, tenders, fees, licence format, quarries, the rehabilitation guarantee and service providers have not been published; when they are, the local shareholding rules, fees and licence terms now drawn from the 2019 Regulations may change.
- A Prime Minister's Order on the Licensing Committee (Article 6(2)) and Ministerial Orders on dynamites (Article 43(3)) and on the Government's free carried interest (Article 49(2)) are awaited; the last will determine whether, and how much, free equity the State takes in new mining licences.
- A revision of the mining framework "to close loopholes" has been reported by commentators, but no bill had been identified at 10 October 2026; watch the Chamber of Deputies' agenda and the Official Gazette.
- RMB lists GIMCS, a digital mineral traceability project (DMTS) and an MCIS upgrade among its key projects, and appointed a Division Manager for Mining Cadastre and Digital Information in March 2026; check the portals for changes in filing steps.
- The first designation of strategic minerals under Article 3(d), if made, would most likely concern minerals in demand for the energy transition such as lithium or rare earths; any designation would be published by RMB.

## Terms you will meet in the documents

| English                                     | Kinyarwanda                                              | French                                                 | Meaning                                                                                                                 |
|---------------------------------------------|----------------------------------------------------------|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| Rwanda Mines, Petroleum and Gas Board (RMB) | <i>Urwego rushinzwe Mine, Peteroli na Gazi mu Rwanda</i> | <i>Organe Rwandais des Mines, du Pétrole et du Gaz</i> | The public institution that licenses, inspects and sanctions mineral, quarry, oil and gas operations.                   |
| Competent organ                             | <i>Urwego rubifitiye ububasha</i>                        | <i>Organe compétent</i>                                | The State organ in charge of mines and quarries named throughout Law N° 072/2024, which is RMB.                         |
| Mining and quarry operations                | <i>Ubucukuzi bw'amabuye y'agaciro na kariyeri</i>        | <i>Exploitation des mines et carrières</i>             | The activities governed by Law N° 072/2024: exploring, extracting, processing and trading minerals and quarry products. |
| Radioactive minerals                        | <i>Amabuye y'agaciro afite imirasire yangiza</i>         | <i>Minerais radioactifs</i>                            | Minerals containing by weight at least 0.05% of uranium, thorium or both, which need a special licence.                 |
| Strategic minerals                          | —                                                        | <i>Minerais stratégiques</i>                           | Minerals that RMB may designate under Article 3(d) for the Government's exclusive rights in the public interest.        |
| Potential mining area                       | <i>Indiri y'amabuye y'agaciro</i>                        | <i>Zone potentielle des minerais</i>                   | An economically viable mineralised area demarcated by RMB and listed with its coordinates and conditions.               |

| English              | Kinyarwanda                             | French                     | Meaning                                                                                                                             |
|----------------------|-----------------------------------------|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| Fair compensation    | <i>Indishyi ikwiye</i>                  | <i>Juste indemnisation</i> | What a mining licence holder must pay the landowner or lawful occupier before mining starts under Article 4.                        |
| Controlling interest | <i>Inyungu z'ubwiganze bw'imigabane</i> | <i>Intérêt majoritaire</i> | Direct or indirect power over more than 50% of management or a majority holding; acquiring it transfers a public company's licence. |

### FOREIGN V RWANDAN INVESTOR

Nothing in the framework rules of the Mining Law depends on nationality. State ownership, the landowner's rights, the duty to hold a licence, the role of RMB and the Committee, and the faults and offences apply equally to a Rwandan citizen, a company owned by nationals of other East African Community (EAC) or Common Market for Eastern and Southern Africa (COMESA) states, and a company owned from Europe, Asia or the Americas. The Law defines "person" to include individuals, companies and cooperatives without any residence or nationality condition.

The differences come from the 2019 Regulations RMB still applies, which define "local shareholders" as Rwandan citizens holding shares. Under them a small-scale mine must be owned by Rwandan nationals and a medium-scale mine must have at least 40% local shareholders, while exploration and large-scale mining licences carry no ownership condition (Mining licences and quarry licences). EAC and COMESA nationals count as foreign for those rules. In practice a foreign investor applies through a company registered in Rwanda, because RMB's invitations require registration with RDB, and foreign individuals and companies also face the land rules that limit how foreigners hold land ([How foreign investors access land](#)), which matters little for mining because the mined land passes to the State.

### WATCH OUT FOR

- Assuming that land ownership, a land concession or an emphyteutic lease includes the minerals: under Article 3(a) it never does, and letting others mine the land without a licence is an offence for the landowner.
- Citing Article 4 for State ownership in contracts or opinions: the ownership rule is Article 3(a); Article 4 deals with the landowner's compensation and lease.
- Building a project on the 2019 Regulations without RMB's written confirmation that they still apply to the file, given that the 2024 Law saves only licences.
- Licences granted under the 2018 law that are close to expiry: they lapse on their original date, and renewal will be decided under the 2024 Law.
- Dealing with RMB officials informally rather than through GIMCS and written correspondence, when decisions, time limits and review rights run from written notification.
- Overlooking the power to designate strategic minerals or Government quarries, which could affect a deposit of a mineral whose importance grows.

---

## OFFICIAL SOURCES

- Rwanda Mines, Petroleum and Gas Board: Law N° 072/2024 of 26/06/2024 on mining and quarry operations (Official Gazette n° Special of 24/07/2024) — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Laws/Law\\_n\\_\\_0722024of\\_26062024\\_on\\_mining\\_and\\_quarry\\_operations.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Laws/Law_n__0722024of_26062024_on_mining_and_quarry_operations.pdf)
- Rwanda Mines, Petroleum and Gas Board: Presidential Order N° 028/01 of 18/05/2023 governing RMB — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Laws/LAW\\_ESTABLISHING\\_RMB.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Laws/LAW_ESTABLISHING_RMB.pdf)
- Rwanda Mines, Petroleum and Gas Board: Regulations of the Chief Executive Officer N° 001 to 007/MINES/RMB/2019 of 18/07/2019 — <https://www.rmb.gov.rw/publications/regulations>
- Rwanda Mines, Petroleum and Gas Board: Ministerial Orders page (Ministerial Order N° 007/01 of 19/07/2019 and others) — <https://www.rmb.gov.rw/publications/ministerial-orders>
- Rwanda Mines, Petroleum and Gas Board: Sites and Apps (GIMCS and MCIS portals) — <https://www.rmb.gov.rw/sites-apps-1>
- Rwanda Development Board: business procedures portal, ESIA steps citing Ministerial Order N° 003/MoE/25 (shown within the special economic zone user licence procedure) — <https://businessprocedures.rdb.rw/procedure/print/188/step/0?showRecourses=true&showCertification=false&l=en&embed=true&includeSearch=false>

## Mining licences and quarry licences: exploration, small-, medium- and large-scale mining, trading and processing licences under Law N° 072/2024, block sizes and terms, applications on GIMCS and competitive rounds, RMB fees, the local shareholding rules, transfers and pledges, reporting duties, suspension and cancellation, and the three quarry licences

Reviewed 10 October 2026 · Prepared by a commercial lawyer with over 30 years' international experience · Legal and tax information, not legal advice · [How we check](#) · [Open in the app](#)

### WHAT YOU NEED TO KNOW

- Article 7 of Law N° 072/2024 of 26/06/2024 on mining and quarry operations provides for an exploration licence, small-, medium- and large-scale mining licences, a mineral trading licence and a mineral processing licence, Article 25 adds a special licence for radioactive minerals, and Article 28 creates non-commercial small-scale, commercial small-scale and industrial quarry licences.
- Under Articles 8, 13 and 14 of Law N° 072/2024 an exploration block may be up to 400 ha and an exploration licence lasts up to four years, renewable once for up to four years, while mining blocks may be up to 50 ha (small-scale), 100 ha (medium-scale) or 400 ha (large-scale) and a mining licence lasts up to 15 years, renewable more than once for up to 15 years each time on an application made within the 90 days before expiry.
- Under Regulations N° 005/MINES/RMB/2019 of 18/07/2019, still applied by the Rwanda Mines, Petroleum and Gas Board (RMB), a small-scale mine must be owned by Rwandan nationals and a medium-scale mine must have at least 40% Rwandan shareholders, while Regulations N° 003/MINES/RMB/2019 require a mineral trading licence applicant to hold the Rwandan franc equivalent of USD 250,000 in a local bank.
- Under Articles 16 to 18 of Law N° 072/2024 a mining licence, including any transfer of shares in the holder or a pledge of the licence, may be transferred only after at least 30% of the pledged investment has been spent and with RMB's prior written approval, which must be notified within 60 days of the application, and since 29 May 2025 the gain on a licence transfer bears 10% capital gains tax under Law N° 014/2025.
- Regulations N° 005/MINES/RMB/2019 set licence fees of RWF 900,000 for an exploration licence (annual fees rising from RWF 900,000 to RWF 3,600,000), RWF 1,800,000, RWF 2,700,000 and RWF 4,500,000 for small-, medium- and large-scale mining licences, annual fees of RWF 450,000 to RWF 1,800,000 and a surface rent of RWF 6,500 per hectare.

## The licences in the 2024 Law

Every mining or quarry activity in Rwanda needs a licence (Articles 3(b) and 3(c) of Law N° 072/2024 of 26/06/2024 on mining and quarry operations, the Mining Law). Article 7 lists four kinds of **licence for mining operations**: an **exploration operations licence**; a **mining licence** for small-scale, medium-scale or large-scale mining; a **mineral trading licence**; and a **mineral processing licence**. Any activity involving radioactive minerals, from exploration to export, requires a separate **special licence**, whose holder reports monthly (Article 25). Article 28 creates three **quarry licences**: non-commercial small-scale, commercial small-scale and industrial. Law N° 58/2018 already provided for the same three tiers of mining licence and the same maximum block sizes (its Articles 8 and 9), so Be Rwanda Wise FAQ 103, which lists only exploration, large-scale mining, trading and processing licences, is incomplete rather than reflecting an older law.

Licences are exclusive by type. RMB cannot issue a mining licence over land already covered by an existing licence of a similar type, although it may, "for the purpose of national interests", authorise another person to explore for other minerals in an area already licensed (Article 12(1)). A holder may not extract a mineral not covered by its licence without RMB's prior authorisation (Article 12(2)), must notify RMB immediately if it finds one (Article 24(2)), and may apply within 90 days to add it to the licence (Article 23(2)). A quarry licence and a mining licence may coexist over the same area if RMB finds that the operations will not interfere with each other (Article 36).

The area of a licence consists of one or more contiguous **blocks**, each reported on separately in the business plan (Article 8). The maximum size of each block is 400 hectares for exploration, 50 hectares for small-scale mining, 100 hectares for medium-scale mining and 400 hectares for large-scale mining. The categorisation criteria in Regulations N° 005/MINES/RMB/2019 of 18/07/2019, which RMB still applies (The Mining Law 2024 and the regulators), align with those sizes: a large-scale mine has a block of more than 100 and up to 400 hectares, a medium-scale mine more than 50 and up to 100 hectares, and a small-scale mine up to 50 hectares. Large and medium mines must also use modern equipment, process up to export grades and employ qualified staff, including, for a large mine, a mine manager and professionals in mining engineering, processing, environment, health and safety and community relations (Articles 7 and 8 of the Regulations).

### Mineral and quarry licences at 10 October 2026

| Licence                        | Maximum block             | Term                                                                  | Granted by                    | Holder conditions        |
|--------------------------------|---------------------------|-----------------------------------------------------------------------|-------------------------------|--------------------------|
| Exploration operations licence | 400 ha                    | Up to 4 years, renewable once for up to 4 years (Articles 13 and 14)  | RMB on the Committee's advice | No nationality condition |
| Large-scale mining licence     | 400 ha (more than 100 ha) | Up to 15 years, renewable more than once for up to 15 years each time | RMB on the Committee's advice | No nationality condition |

| Licence                                   | Maximum block            | Term                                                                           | Granted by                          | Holder conditions                                           |
|-------------------------------------------|--------------------------|--------------------------------------------------------------------------------|-------------------------------------|-------------------------------------------------------------|
| Medium-scale mining licence               | 100 ha (more than 50 ha) | Up to 15 years under the Law; 10 years under Regulations N° 005/MINES/RMB/2019 | RMB on the Committee's advice       | At least 40% Rwandan shareholders (Regulations, Article 8)  |
| Small-scale mining licence                | 50 ha                    | Up to 15 years under the Law; 5 years under the Regulations                    | RMB on the Committee's advice       | Owned by Rwandan nationals (Regulations, Article 9)         |
| Mineral processing licence                | Not area-based           | 7 years, renewable (Regulations N° 003/MINES/RMB/2019, Article 5)              | RMB Chief Executive Officer         | Financial and technical capacity                            |
| Mineral trading licence                   | Not area-based           | 5 years, renewable (Regulations N° 003/MINES/RMB/2019, Article 10)             | RMB Chief Executive Officer         | RWF equivalent of USD 250,000 held in a local bank          |
| Special licence for radioactive minerals  | Not stated               | Not stated                                                                     | RMB                                 | Monthly report in the first week of each month (Article 25) |
| Non-commercial small-scale quarry licence | Set by regulations       | 1 year, renewable (Article 30)                                                 | Executive Secretary of the Sector   | Not transferable                                            |
| Commercial small-scale quarry licence     | Set by regulations       | 5 years, renewable                                                             | Administrative Head of the District | Transferable                                                |
| Industrial quarry licence                 | Set by regulations       | Up to 15 years, renewable                                                      | RMB                                 | Transferable; agreement with RMB (Article 73)               |

## Applying directly: GIMCS, the One Stop Center and the Committee

An application for a mining licence is addressed to RMB and, under Article 9(2), the application and the response pass through the One Stop Center. In practice the applicant first checks on the **Geological Information and Mining Cadastre System (GIMCS)** that the area is free and then files online, using RMB's prescribed forms ([FAQ 104](#)). The Chief Executive Officer refers a complete file to the Licensing Committee, which assesses it and advises (Article 11 of Regulations N° 005/MINES/RMB/2019), and the applicant must be notified of the decision **within 90 days** of the date a complete file was received (Article 12). An approved applicant receives the licence in the format set by Regulations N° 004/MINES/RMB/2019; a refused applicant may ask RMB's Board of Directors in writing to review the decision **within 15 days** of notification (Article 13).

RMB's form for an exploration licence asks for the registration certificate, an exploration plan and budget, an RRA tax clearance certificate, two years' proof of financial capacity, proof of technical capacity with curricula vitae of key personnel, and an employment and skills transfer plan. The form for a mining licence adds the shareholding split, the economic value of the resource, the mine design and development programme, a social and environmental management plan based on the approved environmental and social impact assessment, infrastructure, health and safety, and compensation and resettlement plans, a feasibility study, a business plan, a processing and value addition plan and a community development plan. RMB fixes the term on the basis of the feasibility study and programme it approves (Article 13(3) of the Law).

Processing and trading licences follow a lighter procedure under Regulations N° 003/MINES/RMB/2019. The application, with the registration certificate, profile, business plan, tax clearance and proof of capacity, goes to the Chief Executive Officer, who decides **within 60 days** of a complete file; an appeal lies to the Board within 15 days (Articles 3, 4, 8 and 9). A trading licence applicant must also prove that it holds the Rwandan franc equivalent of **USD 250,000** in a local bank (Article 8). Industrial quarry licences go to RMB, and small quarry licences to the District or Sector, as described below.

### Obtaining an exploration or mining licence by direct application

- 1 Register the company in Rwanda**  
Incorporate with RDB and obtain a tax identification number; a tax clearance certificate is part of every file.

---

- 2 Check the area on GIMCS**  
Confirm that the ground is free (Article 12) and not offered in a competitive round, and fix block coordinates within the Article 8 maximum.

---

- 3 Prepare the file**  
Use RMB's form for the licence type; for a mining licence the feasibility study and the approved impact assessment are the critical path.

---

- 4 File online and through the One Stop Center**  
Submit on GIMCS, through the One Stop Center (Article 9(2)), and keep proof of the date the file was complete.

---

- 5 Committee assessment and decision**  
The Chief Executive Officer refers the file to the Licensing Committee and notifies the decision within 90 days of a complete file (Regulations N° 005/MINES/RMB/2019, Articles 11 and 12).

---

- 6 Review of a refusal**  
Ask RMB's Board of Directors in writing to review a refusal within 15 days of notification (Article 13 of the Regulations); a court challenge may follow.

---

## 7 Pay the licence fee and sign the agreement

Pay the grant fee; an industrial mining licence holder also signs an agreement with RMB (Article 73).

## 8 Start on time

Begin exploration within 90 days or mining within 180 days of issue (Articles 22(a) and 24(1)(b)), after lodging the rehabilitation guarantee and settling leases or compensation with landowners (Article 4).

# Competitive rounds: the Mining Investment Pitchbook

Article 10 of the Mining Law allows RMB to call for applications "through open competition" for exploration or mining licences, and Chapter V of Regulations N° 005/MINES/RMB/2019 sets the tender rules: publication on RMB's website and in media in Rwanda and abroad, evaluation against published criteria, disqualification of bidders who are debarred, insolvent or in liquidation, publication of the Committee's evaluation report, and negotiation with the successful bidder before the licence is issued (Articles 16 to 29). RMB has used this route since 2025 through its **Mining Investment Pitchbook**. The first round, launched in May 2025, offered 10 blocks with a deadline of 16 August 2025 and drew 73 applications. The second, published on 3 December 2025, offered another 10 blocks, four for mining, four for exploration and two for gemstones, with a deadline of 3 March 2026.

The December 2025 instructions show how RMB assesses bids. Applicants must be registered with RDB or, for cooperatives, the Rwanda Cooperative Agency, submit in English through RMB's cloud platform, and keep their proposals valid for 90 days. Mining blocks are scored on pledged budgets for mine development, further exploration, beneficiation, community, infrastructure, environment and employment, on the approach to value addition up to metal, on track record, and on financial capacity shown by bank statements or three years' audited accounts, which may be a parent company's. The stated minimum financial capacity is **USD 5,000,000 for a large-scale block and USD 2,000,000 for a medium-scale block**, or the equivalent in Rwandan francs. The evaluating committee reports to the licensing committee, which reports to the Chief Executive Officer, and results were to be announced within 90 days of the deadline. The winner then negotiates a mining agreement with RMB; if negotiations fail within 60 days of their start, RMB invites the second-ranked applicant. Budgets pledged in a bid become commitments that RMB will monitor, and they set the investment against which the 30% threshold for transfers is measured.

# Terms, renewal and the step from exploration to mining

An exploration licence runs for an initial period of up to four years and may be renewed **once** for up to four years, and RMB may require the holder to relinquish part of the area on renewal (Articles 13(1) and 14(2)). The renewal application includes a report on the work done and its cost, detailed results and interpretation, the programme and budget for the renewal period, and a plan of the area to be kept (Article 14(1)). The holder has the **primary right** to a mining licence over any part of its area where a deposit is discovered, on meeting the conditions for a mining licence (Article 21(1)(e)). It must apply within the 90 days before its exploration licence expires; if the licence expires before RMB decides, exploration may continue until the decision is notified, and if the mining licence is refused the holder

receives 90 days' notice to close (Article 21(2) to (4)). If the holder lets the licence lapse without applying for renewal or a mining licence within two years, its exploration records and reports become State property (Article 27).

A mining licence runs for an initial period of up to 15 years, fixed on the basis of the feasibility study and programme approved by RMB (Article 13(2) and (3)). It may be renewed "more than one time when considered necessary", each time for up to 15 years (Article 14(4)). The renewal application must be made **within the 90 days before expiry** and must include reserves verified by an independent consultant at the applicant's cost and approved by RMB, the capital investment, costs and revenue forecasts for the renewal period, the planned activities, any change in extraction or processing methods, and the likely social and environmental impacts with mitigation and compensation measures (Article 14(3)). RMB renews where the holder meets the criteria and has implemented its programme well (Article 14(5)), notifies its decision within **60 days**, may change the terms, lets the holder continue operating if the licence expires before the decision, and on refusal fixes a notice period to close (Article 15).

A holder may relinquish all or part of a mining area on at least 90 days' notice, with a map of the area, detailed activity reports, a tax clearance certificate, a certificate from the District labour inspectorate that it owes nothing to its employees, and a rehabilitation certificate; liabilities already incurred survive (Article 26). Under Article 15 of Regulations N° 005/MINES/RMB/2019, an exploration licence holder that gives up at least half of its area on renewal pays a fee linked to the annual fee instead of the full renewal fee.

#### **RMB licence fees (Regulations N° 005/MINES/RMB/2019, Articles 30 to 34, and N° 003/MINES/RMB/2019, Articles 13 to 15)**

| Licence             | Grant                       | Renewal       | Annual licence fee                                                                         | Transfer      | Annual surface rent                                     |
|---------------------|-----------------------------|---------------|--------------------------------------------------------------------------------------------|---------------|---------------------------------------------------------|
| Exploration         | RWF 900,000                 | RWF 1,100,000 | Year 1 RWF 900,000; year 2 RWF 1,800,000; year 3 RWF 2,700,000; years 4 to 8 RWF 3,600,000 | RWF 900,000   | None                                                    |
| Large-scale mining  | RWF 4,500,000               | RWF 9,000,000 | RWF 1,800,000                                                                              | RWF 4,500,000 | RWF 6,500 per hectare                                   |
| Medium-scale mining | RWF 2,700,000               | RWF 5,400,000 | RWF 900,000                                                                                | RWF 2,700,000 | RWF 6,500 per hectare                                   |
| Small-scale mining  | RWF 1,800,000               | RWF 3,600,000 | RWF 450,000                                                                                | RWF 1,800,000 | RWF 6,500 (the Regulations do not repeat "per hectare") |
| Mineral processing  | RWF 100,000 application fee | RWF 100,000   | RWF 100,000                                                                                | Not stated    | None                                                    |

| Licence         | Grant                                                    | Renewal       | Annual licence fee | Transfer   | Annual surface rent |
|-----------------|----------------------------------------------------------|---------------|--------------------|------------|---------------------|
| Mineral trading | RWF 200,000 application fee plus RWF 100,000 licence fee | RWF 1,000,000 | RWF 5,000,000      | Not stated | None                |

## Fees and when they fall due

The fees in the table come from the 2019 Regulations, which RMB still applies; Article 47 of the 2024 Law calls for new fee regulations, none of which had been published at 10 October 2026. Fees are paid into RMB's account. Article 34 of Regulations N° 005/MINES/RMB/2019 requires the annual licence fee and surface rent to be paid "before 31st December of following year", and Article 15 of Regulations N° 003/MINES/RMB/2019 uses similar words for processing and trading licences; because the wording does not state clearly which year a payment covers, holders should obtain RMB's written statement of each year's amount and due date. Failing to make any payment required under the Law leads to provisional suspension (Article 52(a)), and persistent failure without cause to cancellation (Article 53(b)).

## Who may hold which licence: the local shareholding rules

The Mining Law contains no nationality condition: "person" includes an individual, a company, a cooperative, a subsidiary and a partnership, without any residence test. The ownership limits come from **Regulations N° 005/MINES/RMB/2019**, which RMB still applies. Article 8 provides that a medium-scale mine must "have at least forty percent (40%) local shareholders", and Article 9 that a small-scale mine must "be owned by Rwandan nationals". Article 2 defines local shareholders as "Rwandan citizens who hold shares in a company". The model agreements in Regulations N° 004/MINES/RMB/2019 repeat these as 40% and 100% local shareholding. No equivalent rule applies to exploration licences, large-scale mining licences, processing licences or trading licences. RMB's application forms ask for the local and foreign percentage of shareholding for every licence type, so the structure is visible from the first filing.

Be Rwanda Wise FAQ 105 states that there is no general restriction on foreign ownership and no mandatory local partner. That is right for exploration and large-scale licences but overlooks the 2019 rules for small and medium mines and the Government's possible free carried interest under Article 49 of the Law ([Mining agreements, local content and community](#)). The practical consequences are these. A foreign investor that discovers a deposit too small for a large-scale licence must either bring in Rwandan shareholders holding at least 40% for a medium-scale mine, or limit its role to that of a buyer, processor, lender or service provider to Rwandan-owned small-scale miners and cooperatives. A foreign-owned trader needs USD 250,000 in a Rwandan bank and must bank all its mineral trade through institutions in Rwanda (Article 12 of Regulations N° 003/MINES/RMB/2019). Because these limits rest on regulations made under the repealed 2018 law, the position could change when RMB issues regulations under the 2024 Law ([Sectors open to foreign investors and licensing](#)).

## Transfers, share sales and pledges

Article 16 of the Mining Law treats almost any change in the holder as a **transfer of the licence**. For a private company, a transfer includes any assignment, sale or disposal of the licence, the **pledge** of the licence or the seizure of a pledged licence, and "the transfer of any share by one or more shareholders having rights on a mining licence" (Article 16(3)). For a public company it means acquiring a **controlling interest**, defined as the direct or indirect power over more than 50% of management or a majority holding (Article 16(4) and Article 2). Every transfer needs RMB's prior written authorisation (Article 16(2)), and no transfer by assignment of shares may take place until the holder has spent **at least 30% of the investment it pledged** when the licence was granted (Article 16(1)). On registration of the new holder, the transferor's rights and obligations pass immediately to the transferee (Article 16(5)).

The application under Article 17 includes the holder's written application, minutes of the shareholders' or members' meeting approving the transfer held before a notary authorised by the Government, the transferee's profile and mining experience, its certificate of registration, a tax clearance certificate for the transferor, a document showing the value of the transaction, a disclosure of any other relations or common business interests between the parties, and the transferee's commitment to uphold the transferor's obligations. RMB must notify its decision within **60 days** of receipt (Article 18). A transfer made without complying with the Law is a ground for cancellation (Article 53(e)), and the 2019 Regulations charge a transfer fee equal to the grant fee. Quarry licences may be transferred only if they are commercial small-scale or industrial licences (Article 32).

Two consequences matter for transactions. First, the purchase of even a small minority stake from an existing shareholder is a transfer requiring approval, a new share issue that changes the ownership of the holder should be cleared with RMB in the same way, and a pledge of the licence and its seizure are both transfers, as is the enforcement of a share pledge; a buyer or lender should build the 60-day approval and the 30% investment test into its timetable and conditions precedent (Due diligence in Rwanda). Second, since 29 May 2025 Law N° 014/2025 of 27/05/2025 extends the 10% capital gains tax to transfers of licences as well as shares, withheld by the seller or buyer for a licence and by the Rwandan company for shares, and declared within 15 days after the month of the transfer (Capital gains, property and other taxes).

## Obligations while the licence runs

An exploration licence holder must start within 90 days, report every six months, keep detailed technical and expenditure records at its address in Rwanda and file an audited statement of exploration expenditure within 90 days after each anniversary of the licence (Article 22). A mining licence holder must mine under the approved mine development programme and environmental management plan, start within 180 days, install beacons, keep technical and financial records in Rwanda and send copies to RMB every six months, manage tailings as RMB requires, and give RMB one year's notice of permanent closure, six months' notice of temporary suspension and three months' notice of a reduction in output (Article 24).

Every licence holder files audited annual financial statements prepared under International Financial Reporting Standards with RMB and RRA within three months of its financial year end (Article 44), except a non-commercial small-scale quarry, and keeps separate books for any activity not connected

with the licence (Article 45). Regulations N° 005/MINES/RMB/2019 require quarterly reports on prescribed forms (Article 35), more frequent than the six-monthly reports in the Law, and processing and trading licence holders must report quarterly, keep records of contracts with miners, suppliers, buyers, smelters, refineries and banks together with assay reports and customs records, and send a sample of every export to RMB or a designated laboratory (Articles 7 and 12 of Regulations N° 003/MINES/RMB/2019). Traceability and export certification duties are covered in [3T, gold and traceability](#).

### Administrative sanctions on licence holders (Law N° 072/2024)

| Breach                                                                                                                         | Mining licence holder                                                                                               | Quarry licence holder                                                       |
|--------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| Late or false report; documents kept away from the site; suspension without notice; failure to fix boundaries                  | Fine of RWF 500,000 (Article 51)                                                                                    | Fine of RWF 300,000 (Article 56)                                            |
| Removing or destroying demarcation features                                                                                    | Fine of RWF 5,000,000 (Article 54(1))                                                                               | Industrial: RWF 1,000,000; commercial small-scale: RWF 500,000 (Article 59) |
| Displacing or crossing demarcation features                                                                                    | Fine of RWF 10,000,000 (Article 54(2))                                                                              | As above (Article 59)                                                       |
| Unpaid sums; refusing access to inspectors; no employee insurance; unlawful pay; no protective equipment                       | Provisional suspension (Article 52)                                                                                 | Provisional suspension (Article 57)                                         |
| Failure without cause to start on time; failure to pay; breach of licence terms or of a suspension decision; unlawful transfer | Cancellation (Article 53)                                                                                           | Cancellation (Article 58)                                                   |
| Failure to rehabilitate                                                                                                        | Fine of RWF 5,000,000 to RWF 10,000,000 and restitution (Article 55)                                                | Fine of RWF 3,000,000 to RWF 5,000,000 and restitution (Article 60)         |
| Breach of health, safety or environmental standards                                                                            | Fine of RWF 1,000,000 to RWF 3,000,000; RWF 3,000,000 to RWF 5,000,000 if the environment is destroyed (Article 62) | Same (Article 62)                                                           |

## Suspension, cancellation and what follows

When RMB suspends a licence it notifies the holder in writing of a remedy period, and once the problem is remedied authorises resumption by written notice (Article 37(1)). The Law does not fix the length of the remedy period; the 30-day period described in some commentary is not in the 2024 text. On cancellation, RMB gives the holder **90 days** to rehabilitate the site where necessary, clear its liabilities and complete any other step RMB indicates (Article 37(2)). The holder remains liable for environmental

protection until the final rehabilitation certificate is issued (Article 40(2)), and the rehabilitation guarantee stands behind that obligation. An urgent safety decision by an inspector may also require immediate rectification or suspend operations, with an appeal to the head of the organ that issued the licence (Article 42).

## Quarry licences

Quarry operations cover the extraction, processing and trade of geological materials used in works, such as building stone, sand, gravel and clay. An application for an **industrial quarry licence** goes to RMB; one for a **commercial small-scale quarry licence** to the Administrative Head of the District, with a copy to RMB; and one for a **non-commercial small-scale quarry licence** to the Executive Secretary of the Sector, with a copy to the District (Article 29). The categorisation criteria and application requirements are in Regulations N° 007/MINES/RMB/2019. A non-commercial licence lasts one year and a commercial small-scale licence five years, both renewable, and an industrial licence up to 15 years, fixed on the feasibility study and renewable (Article 30).

Commercial and industrial quarry holders may explore, extract, transport, sell, use, process and add value to quarry products; a non-commercial holder may only extract, transport and use them (Article 33). Quarry holders must report as the regulations require, pay leasing fees and compensation for damage to land and property, meet health, safety and environmental standards and pay taxes (Article 34). They may relinquish the area on 30 days' notice for a non-commercial licence and 60 days' for others, with a tax clearance and a certificate of no debt to employees (Article 35). Industrial and commercial quarries need an environmental and social impact assessment before starting (Article 38), and an industrial quarry holder signs an agreement with RMB (Article 73). Trading in illegally extracted quarry products carries two to five years' imprisonment and a fine of RWF 10,000,000 to RWF 20,000,000, or RWF 30,000,000 to RWF 50,000,000 for a legal person (Article 68). Artisanal miners of minerals, as distinct from quarry operators, use the small-scale mining licence, not a quarry licence, contrary to the suggestion in FAQ 114.

### WORKED EXAMPLE

#### Licence costs and a share sale for a foreign tungsten project

A Rwandan company wholly owned by a Canadian group holds an exploration licence for eight years (four plus a four-year renewal, no relinquishment), then obtains a large-scale mining licence over two contiguous blocks of 400 ha and 200 ha. It pledged an investment of RWF 40,000,000,000 in its mining application. In year three of mining it agrees to sell 49% of its shares to a Japanese trading house for RWF 6,000,000,000; the Canadian parent's tax cost of those shares is RWF 2,500,000,000. Illustrative figures under the 2019 fee Regulations.

|                                   |                                                                                                                                                                                                                       |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Exploration fees over eight years | Grant RWF 900,000 + annual fees RWF 900,000 + 1,800,000 + 2,700,000 + 3,600,000 = RWF 9,000,000 for years 1 to 4 + renewal RWF 1,100,000 + 4 × RWF 3,600,000 = RWF 14,400,000 for years 5 to 8. Total RWF 25,400,000. |
| Mining licence, first year        | Grant RWF 4,500,000 + annual fee RWF 1,800,000 + surface rent 600 ha × RWF 6,500 = RWF 3,900,000. Total RWF 10,200,000.                                                                                               |

|                                        |                                                                                                                                                                                                                                 |
|----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Mining licence, each later year</b> | RWF 1,800,000 + RWF 3,900,000 = RWF 5,700,000; over a 15-year term the fees total RWF 4,500,000 + 15 × RWF 5,700,000 = RWF 90,000,000.                                                                                          |
| <b>Can the shares be sold?</b>         | Only after 30% of the pledged investment is spent: 30% × RWF 40,000,000,000 = RWF 12,000,000,000 (Article 16(1)). The company documents spending of RWF 13,200,000,000, so the test is met.                                     |
| <b>RMB approval</b>                    | Application with notarised shareholder minutes, buyer profile, tax clearance, transaction value and disclosure of relations (Article 17); decision within 60 days (Article 18); transfer fee RWF 4,500,000.                     |
| <b>Capital gains tax</b>               | Gain RWF 6,000,000,000 – RWF 2,500,000,000 = RWF 3,500,000,000; 10% = RWF 350,000,000, accounted for by the Rwandan company within 15 days after the month of the transfer under Law N° 014/2025, subject to any treaty relief. |
| <b>Local shareholding</b>              | None required: a large-scale licence carries no nationality condition, so the 51% Canadian and 49% Japanese structure is permissible.                                                                                           |

Had the mine been categorised as medium-scale, at least 40% of the shares would have had to be held by Rwandan citizens, and the sale to a Japanese buyer would have been possible only within the remaining 60%.

Had the share sale been signed before the 30% threshold was reached, it would have been an unlawful transfer and a ground for cancellation under Article 53(e).

## Questions investors ask about mining and quarry licences

### What types of mining licence exist in Rwanda?

Law N° 072/2024 provides for an exploration licence, small-, medium- and large-scale mining licences, a mineral trading licence and a mineral processing licence, plus a special licence for radioactive minerals. Quarries need a non-commercial small-scale, commercial small-scale or industrial quarry licence. All mining licences are granted by RMB.

### How long does a Rwandan exploration licence last?

Up to four years initially, renewable once for up to four years, possibly with part of the area relinquished, under Articles 13 and 14 of Law N° 072/2024. The holder has a primary right to a mining licence over a discovery and must apply within the 90 days before the exploration licence expires.

### Can a foreign company hold a mining licence in Rwanda?

Yes for exploration and large-scale mining licences, which carry no nationality condition. Under Regulations N° 005/MINES/RMB/2019, still applied by RMB, a small-scale mine must be owned by Rwandan nationals and a medium-scale mine must have at least 40% Rwandan shareholders. Applicants must be registered in Rwanda.

## How much does a mining licence cost in Rwanda?

Under the 2019 fee Regulations, a large-scale licence costs RWF 4,500,000 to grant, RWF 1,800,000 a year and RWF 6,500 per hectare in surface rent; medium-scale RWF 2,700,000 and RWF 900,000 a year; small-scale RWF 1,800,000 and RWF 450,000 a year. Exploration costs RWF 900,000 plus annual fees rising to RWF 3,600,000.

## Can shares in a Rwandan mining company be sold freely?

No. Any transfer of shares in a mining licence holder, and any pledge of the licence, is a transfer needing RMB's prior written approval under Article 16 of Law N° 072/2024, allowed only after 30% of the pledged investment has been spent. RMB decides within 60 days, and the gain bears 10% capital gains tax.

### THE 2027 HORIZON

- New regulations under Articles 7, 9, 10, 19, 20, 28 and 47 of Law N° 072/2024 would replace the 2019 categorisation, application, tender and fee rules; the local shareholding limits for small and medium mines and the fee levels may change when they appear.
- RMB was to announce the results of the second pitchbook round, which closed on 3 March 2026, within 90 days; watch RMB's website for the evaluation report, the resulting licences and any third round.
- RMB's December 2025 call for mining-specific investment incentives may lead to changes in the Investment Code Annex that affect the economics of new licences.
- The Ministerial Order on the Government's free carried interest under Article 49 would add a State equity term to new mining licences and should be checked before any licence is granted or transferred.

## Terms you will meet in the documents

| English                        | Kinyarwanda                                                     | French                                                | Meaning                                                                                                 |
|--------------------------------|-----------------------------------------------------------------|-------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| Exploration operations licence | <i>Uruhushya rwo gukora ibikorwa by'ubushakashatsi</i>          | <i>Permis des opérations d'exploration</i>            | The licence to search for minerals over blocks of up to 400 ha for up to four years, renewable once.    |
| Mining licence                 | <i>Uruhushya rwo gucukura amabuye y'agaciro</i>                 | <i>Permis d'exploitation minière</i>                  | The licence to extract minerals, granted for small-, medium- or large-scale mining for up to 15 years.  |
| Small-scale mining licence     | <i>Uruhushya rwo gucukura amabuye y'agaciro mu kirombe gito</i> | <i>Permis d'exploitation minière à petite échelle</i> | A mining licence over blocks of up to 50 ha, reserved by the 2019 Regulations to Rwandan-owned holders. |

| English                      | Kinyarwanda                                                      | French                                                | Meaning                                                                                                  |
|------------------------------|------------------------------------------------------------------|-------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| Mineral trading licence      | <i>Uruhushya rwo gucuruza amabuye y'agaciro</i>                  | <i>Permis de commerce minier</i>                      | The five-year licence to buy, sell, import and export minerals, requiring USD 250,000 in a local bank.   |
| Mineral processing licence   | <i>Uruhushya rwo gutunganya amabuye y'agaciro</i>                | <i>Permis de traitement des minerais</i>              | The seven-year licence to cut, polish, smelt or otherwise process minerals into new products.            |
| Industrial quarry licence    | <i>Uruhushya rwo gucukura kariyeri yo mu rwego rw'inganda</i>    | <i>Permis d'exploitation de carrière industrielle</i> | The RMB licence for large quarries, for up to 15 years, renewable and transferable.                      |
| Transfer of a mining licence | <i>Guhererekanya uruhushya rw'ubucukuzi bw'amabuye y'agaciro</i> | <i>Transfert du permis d'exploitation minière</i>     | Any assignment or pledge of a licence or transfer of shares in its holder, needing RMB's prior approval. |
| Relinquishment               | —                                                                | <i>Renonciation à un périmètre sous permis</i>        | Giving up all or part of a licensed area on notice, with tax, labour and rehabilitation clearances.      |

## FOREIGN V RWANDAN INVESTOR

This is the part of the mining regime where nationality matters most. Under Regulations N° 005/MINES/RMB/2019, still applied by RMB, small-scale mining licences are reserved to companies owned by Rwandan nationals and medium-scale licences require at least 40% Rwandan shareholders, "local shareholders" meaning Rwandan citizens. Nationals and companies of other East African Community (EAC) and Common Market for Eastern and Southern Africa (COMESA) states are foreign for this purpose. Exploration, large-scale mining, processing and trading licences carry no nationality condition, and the Mining Law itself contains none.

A Rwandan investor can therefore enter at any scale, while a foreign investor typically holds exploration and large-scale licences, takes up to 60% of a medium-scale mine, or works with Rwandan small-scale miners and cooperatives as an offtaker, processor or financier. The other rules, including the application file, the fees, the transfer controls, the 10% capital gains tax and the sanctions, apply equally to all. A foreign-owned trader must show the same USD 250,000 as a Rwandan one, and every holder must be registered in Rwanda. Rwandan shareholdings used to meet the 40% test should be real: a nominee arrangement that leaves control abroad may be treated by RMB as non-compliance with the licence conditions.

## WATCH OUT FOR

- Signing a share sale, a pledge of the licence or the enforcement of a share pledge without RMB's prior approval, or before 30% of the pledged investment is spent: it is an unlawful transfer and a ground for cancellation.
- Missing the 90-day window before expiry for a mining licence renewal or for the mining licence that follows exploration.
- Bidding budgets in a competitive round that the project cannot meet: they become monitored commitments and the base for the 30% transfer test.
- Relying on the 15-year maximum term in the Law for a small or medium mine when the 2019 Regulations still prescribe five or ten years; check the term stated in the licence.
- Late annual fees and surface rent: non-payment leads to provisional suspension and, if persistent, to cancellation.
- Treating a quarry licence as a route for artisanal mineral extraction: minerals require a small-scale mining licence.

## OFFICIAL SOURCES

- Rwanda Mines, Petroleum and Gas Board: Law N° 072/2024 of 26/06/2024 on mining and quarry operations — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Laws/Law\\_n\\_\\_0722024of\\_26062024\\_on\\_mining\\_and\\_quarry\\_operations.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Laws/Law_n__0722024of_26062024_on_mining_and_quarry_operations.pdf)
- Rwanda Mines, Petroleum and Gas Board: Regulations N° 005/MINES/RMB/2019 of 18/07/2019 on potential mining areas, categorisation of mines, applications, tenders and fees — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Regulations/Regulations\\_of\\_the\\_CEO\\_No\\_005.MINES.RMB.2019\\_of\\_18.07.2019\\_determining\\_potential\\_mining\\_areas\\_\\_criteria\\_for\\_categorisation\\_of\\_mines\\_\\_modalities\\_and\\_requirements\\_for\\_mineral\\_license\\_application\\_and\\_for\\_tenders.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Regulations/Regulations_of_the_CEO_No_005.MINES.RMB.2019_of_18.07.2019_determining_potential_mining_areas__criteria_for_categorisation_of_mines__modalities_and_requirements_for_mineral_license_application_and_for_tenders.pdf)
- Rwanda Mines, Petroleum and Gas Board: Regulations N° 003/MINES/RMB/2019 of 18/07/2019 on mineral processing and trading licences — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Regulations/Regulations\\_of\\_the\\_CEO\\_No\\_003.MINES.RMB.2019\\_of\\_18.07.2019\\_determining\\_the\\_content\\_of\\_mineral\\_processing\\_and\\_trading\\_licenses\\_and\\_modalities\\_of\\_their\\_granting.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Regulations/Regulations_of_the_CEO_No_003.MINES.RMB.2019_of_18.07.2019_determining_the_content_of_mineral_processing_and_trading_licenses_and_modalities_of_their_granting.pdf)
- Rwanda Mines, Petroleum and Gas Board: application form for small, medium and large-scale mining licences — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Guidelines/SMALL\\_SCALE\\_\\_MEDIUM\\_SCALE\\_AND\\_LARGE\\_SCALE\\_MINING\\_LICENSE.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Guidelines/SMALL_SCALE__MEDIUM_SCALE_AND_LARGE_SCALE_MINING_LICENSE.pdf)
- Rwanda Mines, Petroleum and Gas Board: Annexes to the Rwanda Mining Investment Pitchbook (02/12/2025) — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Pitchbook/Annexes\\_for\\_Rwanda\\_Mining\\_Investment\\_Pitchbook\\_02.12.2025.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Pitchbook/Annexes_for_Rwanda_Mining_Investment_Pitchbook_02.12.2025.pdf)
- Rwanda Mines, Petroleum and Gas Board: a breakdown of the 10 mineral blocks now available to investors (3 December 2025) — <https://www.rmb.gov.rw/news-detail/a-breakdown-of-the-10-mineral-blocks-now-available-to-investors-1>

# Mineral tax, royalties and fiscal terms: the mining royalty and the tax on raw exports under Law N° 056/2024, norm value and gross value, who withholds and when to pay, exemptions and affiliate sales, corporate income tax, VAT and capital gains for mining companies, Investment Code incentives and the State's equity

Reviewed 10 October 2026 · Prepared by a commercial lawyer with over 30 years' international experience · Legal and tax information, not legal advice · [How we check](#) · [Open in the app](#)

## WHAT YOU NEED TO KNOW

- Law N° 056/2024 of 26/06/2024 establishing tax on minerals came into force on publication in the Official Gazette n° Special of 05/07/2024, repealed Law N° 55/2013 of 02/08/2013 on minerals tax, and makes the seller of minerals liable to a mining royalty of 3% of norm value on base metals (including tin, tungsten, tantalum and niobium) and energy minerals, 2% of gross value on gemstones, 2% of norm value on platinum group metals and rare earth elements, and 0.5% of norm value on gold (Articles 3 and 4).
- Under Article 5 of Law N° 056/2024 minerals exported in raw form bear an export tax in addition to the royalty, of 2% of norm value on base metals, platinum group metals and energy minerals, 3% on gemstones, 1% on rare earth elements and 0.5% on gold.
- Under Articles 6, 8 and 10 of Law N° 056/2024 a local mineral processing facility or an exporter withholds the royalty and remits it within 15 days after the month of withholding, a miner that exports its own minerals pays both taxes, the tax falls due on the date of the customs export declaration or of purchase by a local processor, and the export tax is paid before export.
- Under Article 6(3) of Law N° 056/2024 the tax on minerals is neither a deductible expense nor an advance on income tax, Article 7 exempts samples within limits set by RMB and processed minerals and imported minerals for re-export, except gold, and Article 11 requires sales to affiliates at arm's length, with the international market value substituted where the price is lower.
- Mining companies pay corporate income tax at 28% under Law N° 027/2022 as amended, capital gains tax at 10% on transfers of shares and, since 29 May 2025, of licences under Law N° 014/2025, and may use the Investment Code's ten-year loss carry-forward for exploration licence holders, but exporters of unprocessed minerals are excluded from the Investment Code's preferential export rates.

## Two taxes on the sale of minerals

Rwanda taxes minerals under **Law N° 056/2024 of 26/06/2024 establishing tax on minerals** (the Minerals Tax Law). The Chamber of Deputies adopted it at its sitting of 24 May 2024, it was published in the Official Gazette n° Special of 05/07/2024 and, under Article 15, came into force on publication on **5**

**July 2024**, three weeks before the new Mining Law. Article 14 repealed Law N° 55/2013 of 02/08/2013 on minerals tax. Article 13 records that the Law was drafted in English and considered and adopted in Ikingyarwanda. Article 46 of Law N° 072/2024 of 26/06/2024 on mining and quarry operations simply requires mining and quarry licence holders to pay taxes and fees under the relevant legislation.

The "tax on minerals" means the **mining royalty tax** or the **export tax** imposed on the value of minerals produced in a Rwandan mine (Article 2(n)). Under Article 3 the person **who sells minerals** pays the tax. Every category of mineral bears the royalty under Article 4; minerals "exported in raw form" bear the export tax under Article 5 "in addition". According to the Rwanda Revenue Authority (RRA), the 2013 law charged 4% on base metals, 6% on gold and 6% of gross value on precious stones, at a single tax point on export. The 2024 Law cuts the headline rates, collects the royalty at local purchase by a processor as well as at export, and adds a tax on raw exports that processed minerals do not bear. The rates in the table below have not been amended since July 2024.

#### Tax on minerals under Law N° 056/2024 (Articles 2, 4 and 5)

| Category (Article 2)  | Minerals included                                                                                                                                                                                  | Mining royalty (Article 4) | Additional export tax on raw exports (Article 5) | Total on a raw export                   |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|--------------------------------------------------|-----------------------------------------|
| Base metals           | Copper, lead, zinc, nickel, aluminium, tin, iron, tungsten, molybdenum, tantalum, cobalt, bismuth, titanium, manganese, chromium, germanium, vanadium, gallium, hafnium, indium, niobium, thallium | 3% of norm value           | 2% of norm value                                 | 5% of norm value                        |
| Gemstones             | Precious stones used in jewellery                                                                                                                                                                  | 2% of gross value          | 3% of norm value                                 | 2% of gross value plus 3% of norm value |
| Platinum group metals | Ruthenium, rhodium, palladium, osmium, iridium, platinum                                                                                                                                           | 2% of norm value           | 2% of norm value                                 | 4% of norm value                        |
| Rare earth elements   | Zirconium, uranium, thorium, monazite                                                                                                                                                              | 2% of norm value           | 1% of norm value                                 | 3% of norm value                        |
| Energy minerals       | Lithium, cobalt, manganese, graphite                                                                                                                                                               | 3% of norm value           | 2% of norm value                                 | 5% of norm value                        |
| Gold                  | Gold                                                                                                                                                                                               | 0.5% of norm value         | 0.5% of norm value                               | 1% of norm value                        |

## Norm value, gross value and RMB's role

Most rates apply to the **norm value**: the value of the minerals on the international market at the date the dealer is granted a certificate for their sale, excluding processing costs approved by the competent authority (Article 2(b)). The **international market value** is the price set by a recognised global minerals pricing platform (Article 2(i)), and the **grade** is the measured mineral content with reference to the payable factors in the form in which the mineral is sold (Article 2(j)). The royalty on gemstones is instead charged on **gross value**, the value of the minerals before deducting the expenses of processing them in a local mineral processing facility (Article 2(a)). The competent authority is the State organ in charge of minerals, the Rwanda Mines, Petroleum and Gas Board (RMB).

Under Article 9 **RMB determines the grade, value and processing charges** for minerals, and a regulation of RMB is to establish the mechanism for doing so. No regulation made under Article 9(2) appears on RMB's published regulations page, so the values are fixed through RMB's certification of each lot before export, recorded in its Mineral Certification Information System (MCIS). A taxpayer that disagrees with the grade or value used should raise it with RMB before the export declaration, because the tax falls due at that point, and may then challenge any resulting assessment under the tax procedures law ([Tax administration, audits and disputes](#)).

Two drafting points do not change the result. Cobalt and manganese appear in both the base metals list and the energy minerals list, but both categories carry 3% royalty and 2% export tax, so the double listing makes no difference. Niobium, which occurs with tantalum in coltan, is a base metal. Uranium and thorium are rare earth elements for this Law, although their mining needs the special radioactive minerals licence under the Mining Law.

## Who pays, who withholds and when

Although the seller is the taxpayer, the Law collects the royalty through the buyer. Under Article 6(1) a **local mineral processing facility**, meaning a facility licensed by RMB for mineral processing (Article 2(o)), or a **person who exports minerals** from Rwanda must withhold the mining royalty, declare it and remit it to RRA. Where the miner and the exporter are the same operator, there is no withholding: the exporter pays both the royalty and the export tax itself (Article 6(2)).

Under Article 8 the tax on minerals is due on the date of export or the date on which the minerals were bought by a local mineral processing facility, and the date of the customs export declaration is the date of export. Under Article 10 the taxpayer declares and pays the **export tax before the minerals are exported**, and declares and pays any royalty it has withheld **within 15 days following the month** in which it was withheld. A sale between licensed traders inside Rwanda is not itself a tax point under Article 8; the royalty is withheld when the minerals reach a local processor or leave the country, and the exporter at that stage must account for it. Traders should therefore agree in their purchase contracts who bears the royalty that the exporter will withhold.

Late declaration or payment brings the ordinary consequences of Law N° 020/2023 of 31/03/2023 on tax procedures: interest of 0.5% to 1.5% a month, capped at the amount of the tax, and fines for late or incorrect declarations. Under the Mining Law, failing to pay sums due is also a ground for provisional suspension of the licence (Article 52(a)).

## From mine to export: how the tax on minerals is collected

- 1 Production and tagging**

The miner records production and, for 3T minerals and gold, tags each lot under the traceability system; see 3T, gold and traceability.

---
- 2 Sale to a processor or trader**

If a licensed local processing facility buys, it withholds the royalty at the date of purchase (Articles 6 and 8). If a licensed trader buys for export, the royalty will be withheld on export.

---
- 3 Grade and value**

RMB determines the grade, value and processing charges (Article 9); the norm value is the international market value at the date of the sale certificate, less approved processing costs.

---
- 4 Export certificate**

The exporter applies through MCIS for a Mineral Export Certificate or an ICGLR certificate, and submits a sample to RMB or a designated laboratory.

---
- 5 Export tax before export**

For minerals exported in raw form, the exporter declares and pays the export tax before the minerals leave Rwanda (Article 10(1)); the customs export declaration date is the tax point.

---
- 6 Remit the royalty**

The processor or exporter declares and pays the royalty it withheld within 15 days after the month of withholding (Article 10(2)); a miner exporting its own minerals pays the royalty itself.

---
- 7 Keep the records**

Retain sale certificates, assay reports, customs declarations and payment receipts for RRA and RMB; processors and traders must keep them under Regulations N° 003/MINES/RMB/2019.

---

## Exemptions, affiliate sales and anti-avoidance

Article 7 provides two exemptions. Samples of minerals exported for essay, analysis or other examination are exempt, within a quantity fixed by RMB regulation (Article 7(1)); the 2019 RMB Regulations on samples and the mineral sample permit issued through GIMCS govern the quantities. And **processed minerals, and imported minerals to be re-exported, except gold, are exempt from tax on minerals at the export point** (Article 7(2)). A smelter or refinery that buys concentrate from Rwandan miners therefore withholds the royalty on its purchase but pays no export tax when it exports metal, while an exporter of raw concentrate pays both. Imported gold re-exported from Rwanda is not exempt, so a refiner of imported gold pays the tax on minerals at export, a rule that ties in with the scrutiny of gold flows discussed in [3T, gold and traceability](#).

Article 11 requires the holder of a mining licence or a licence to sell minerals to sell to **affiliated companies** only at a price at least equal to what it would obtain in arm's length sales to non-affiliated purchasers, on terms that would be agreed regardless of affiliation. Where it sells below the international market value, RMB and RRA may use the international market value to determine the value. Article 12 lets RRA disregard, combine or recharacterise a **tax avoidance arrangement**, disregard a person facilitating it, treat related persons as one, and reallocate income or expenditure. A tax avoidance arrangement includes one whose sole or main purpose is a tax benefit, one carried out in a way not normally used for genuine business purposes, and one creating rights and obligations not normally created at arm's length (Article 2(k)). Offtake agreements with a parent company or trading affiliate abroad should therefore be priced by reference to a recognised benchmark, and documented under the transfer pricing rules in Ministerial Order N° 003/26/10/TC of 29/04/2026 ([Transfer pricing and international tax](#)).

## Not deductible: the interaction with income tax

Article 6(3) states that the tax on minerals "is not an accepted deductible expense or an advance on income tax in the determination of taxable base for income tax". A mining or trading company therefore pays corporate income tax on its profit computed before the royalty and export tax, and cannot credit them against its corporate income tax liability. That is a significant change from the general rule that business taxes are deductible, and it makes the effective burden of the mineral tax higher than its headline rate: each RWF 100 of royalty costs RWF 100 and saves no income tax.

Corporate income tax is charged at **28%** under Law N° 027/2022 of 20/10/2022 establishing taxes on income, as amended by Law N° 051/2023 of 05/09/2023 ([Corporate income tax](#)). Losses carry forward for five tax periods, but the Annex to Law N° 006/2021 of 05/02/2021 on Investment Promotion and Facilitation (the Investment Code) allows a registered investor holding an **exploration licence** to carry losses forward for **ten years** where its exploration expenditure is at least 50% of its total expenditure ([FAQ 107](#)). The general limits apply to mining groups as to others: related-party management, technical and royalty fees are deductible only up to 2% of turnover, interest on related-party loans is not deductible beyond four times paid-up equity, and a change of more than 25% in the ownership of an unlisted company cancels its carried-forward losses. Payments to non-resident drilling, assay, engineering and consultancy firms bear 15% withholding tax unless a treaty reduces it ([Withholding taxes and tax treaties](#)).

Neither the Mining Law nor the Minerals Tax Law offers **fiscal stabilisation**, and no published model agreement under Regulations N° 004/MINES/RMB/2019 freezes tax rates. A stability commitment in a negotiated mining agreement would be an unusual term whose effect against a later Act of Parliament is untested in Rwanda, and investors should model the possibility that rates change, as they did in both directions in 2024 and 2025.

## VAT, customs and capital gains

Under Article 7 of Law N° 049/2023 of 05/09/2023 establishing value added tax, both **exports** and **minerals sold on the domestic market** are zero-rated ([VAT and electronic invoicing](#)). A miner selling concentrate to a local smelter or trader therefore charges VAT at 0% and, if registered, recovers the 18% VAT on its inputs. The VAT exemption for industrial machinery, capital assets and raw materials

ended on 30 June 2026; since 1 August 2026 RRA's Commissioner General Guidelines for the Implementation of the VAT Deferral Facility have let an eligible taxpayer in mining, mineral exploration or exploitation, natural gas extraction for energy generation or manufacturing defer import VAT on capital goods and machinery in Chapters 84 and 85 of the EAC Common External Tariff, where the VAT on a consignment is at least RWF 10,000,000 and the application is made to the Commissioner for Customs Services before the goods arrive; spare parts and consumables are excluded unless that Commissioner approves, and an application may be accompanied by the RMB licence or certificate (Customs and EAC trade). Mining equipment imported from outside the East African Community bears the Common External Tariff unless an investor exemption applies.

Since 29 May 2025 Law N° 014/2025 of 27/05/2025 has charged **capital gains tax at 10%** on direct and indirect transfers, in Rwanda or abroad, of shares and of **licences**, debt instruments, options, guarantees and similar assets. For shares, the Rwandan company whose shareholders change withholds and pays; for a licence, the seller or buyer does; payment is due within 15 days after the month of the transfer. The sale of a foreign holding company that owns a Rwandan licence holder is therefore within the charge, as well as needing RMB's approval as a transfer under Article 16 of the Mining Law ([Mining licences and quarry licences](#); [FAQ 25](#)). The Investment Code exempts registered investors from capital gains tax except on commercial immovable property, but how that exemption applies to licence transfers after the 2025 extension has not been clarified by a published ruling ([Capital gains, property and other taxes](#)).

#### Fiscal terms for a mining company at 10 October 2026

| Item                                                                                | Rate or amount                                                                              | Source                                             |
|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|----------------------------------------------------|
| Mining royalty                                                                      | 0.5% (gold) to 3% (base and energy minerals) of norm value; 2% of gross value for gemstones | Law N° 056/2024, Article 4                         |
| Export tax on raw exports                                                           | 0.5% (gold) to 3% (gemstones) of norm value                                                 | Law N° 056/2024, Article 5                         |
| Deductibility of mineral tax                                                        | Not deductible and not creditable against income tax                                        | Law N° 056/2024, Article 6(3)                      |
| Corporate income tax                                                                | 28%                                                                                         | Law N° 027/2022 as amended, Article 48             |
| Loss carry-forward                                                                  | 5 tax periods; 10 years for exploration licence holders spending 50% or more on exploration | Law N° 027/2022, Article 31; Investment Code Annex |
| Withholding tax on dividends, interest, royalties and service fees to non-residents | 15%, reduced by some treaties                                                               | Law N° 027/2022, Article 60                        |
| Capital gains tax on shares and licences                                            | 10%                                                                                         | Law N° 014/2025                                    |
| VAT on mineral sales                                                                | 0% on exports and on minerals sold on the domestic market; 18% standard rate on inputs      | Law N° 049/2023, Articles 4 and 7                  |

| Item                                | Rate or amount                                                    | Source                                        |
|-------------------------------------|-------------------------------------------------------------------|-----------------------------------------------|
| Preferential export income tax rate | Not available to exporters of unprocessed minerals                | Investment Code Annex                         |
| RMB licence fees and surface rent   | See the fee table in Mining licences and quarry licences          | Regulations N° 005 and N° 003/ MINES/RMB/2019 |
| Government free carried interest    | Permitted, but to be set by a Ministerial Order not yet published | Law N° 072/2024, Article 49                   |

## Investment Code incentives for mining

Mining sits partly inside and partly outside the incentive regime of the Investment Code. Article 4 of the Code lists **mining activities relating to mineral exploration** and **processing and value addition in mining** among the priority sectors, and point XVI of its Annex gives exploration licence holders the ten-year loss carry-forward described above. But the preferential corporate income tax rates for exporters, 25% for a registered investor exporting 30% to 49% of turnover and 15% for one exporting 50% or more, **do not apply to exporters of unprocessed minerals** (Investment incentives). Together with the export tax on raw exports and the exemption of processed minerals from tax at export, this steers investors towards concentration, smelting and refining in Rwanda. RMB reported in December 2025 that refining of gold, tin and tantalum was already operational in the country.

Whether a particular processing project qualifies for the 15% rate, the seven-year tax holiday for investments of at least USD 50,000,000 in listed sectors, accelerated depreciation or customs exemptions depends on the Annex and on registration with RDB, and should be checked against the investment chapter. At Rwanda Mining Week in December 2025, RMB's Chief Executive Officer called for incentives specific to mining; no amendment to the Investment Code had been gazetted at 10 October 2026.

## The State's equity: Articles 48 and 49

Two provisions of the Mining Law give the Government a possible share of projects beyond tax. Under Article 48 the Government may acquire shares in mining or quarry operations on terms agreed with the licence holder. Under Article 49 "the grant of a mining licence may entitle the government with free carried interest", with the number of shares and the modalities to be set by an Order of the Minister in charge of Government investment. That Order had not been published at 10 October 2026, so no free carried interest can yet be imposed as a condition of a licence; but the power exists, and Be Rwanda Wise FAQ 112, which says there is no mandatory Government participation, does not mention it. In practice the Government has taken equity by agreement, most recently in the tungsten venture announced on 14 September 2026, in which Almonty Industries holds 75% and the Government 25% in return for contributing an exploration concession and a processing licence. State participation, mining agreements and community contributions are covered in [Mining agreements, local content and community](#).

## WORKED EXAMPLE

### The tax on a tin concentrate export, a gold export and a sale to a local smelter

A Rwandan company holding a large-scale mining licence and a trading licence exports a lot of cassiterite concentrate whose norm value, set by RMB, is RWF 1,800,000,000. A separate gold exporter ships gold with a norm value of RWF 2,500,000,000. Illustrative figures only.

|                                                          |                                                                                                                                                                                                                                                                              |
|----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Cassiterite exported raw by the miner</b>             | Royalty $3\% \times \text{RWF } 1,800,000,000 = \text{RWF } 54,000,000$ ; export tax $2\% \times \text{RWF } 1,800,000,000 = \text{RWF } 36,000,000$ ; total RWF 90,000,000 (5%), the export tax paid before export and the royalty paid by the miner itself (Article 6(2)). |
| <b>Under the 2013 law</b>                                | $4\% \times \text{RWF } 1,800,000,000 = \text{RWF } 72,000,000$ at export. The 2024 law is cheaper for processed or locally sold minerals but RWF 18,000,000 dearer for this raw export.                                                                                     |
| <b>Same concentrate sold to a licensed local smelter</b> | The smelter withholds the 3% royalty, RWF 54,000,000, at purchase and remits it within 15 days after the month; no export tax is due on the concentrate, and the smelter's later export of tin metal is exempt at the export point (Article 7(2)).                           |
| <b>Gold exported in raw form</b>                         | Royalty $0.5\% + \text{export tax } 0.5\% = 1\% \times \text{RWF } 2,500,000,000 = \text{RWF } 25,000,000$ , against $6\% = \text{RWF } 150,000,000$ under the 2013 law.                                                                                                     |
| <b>Income tax effect for the miner</b>                   | Accounting profit after deducting the RWF 90,000,000 mineral tax is RWF 400,000,000. Because the tax is not deductible (Article 6(3)), taxable profit is RWF 490,000,000 and corporate income tax at 28% is RWF 137,200,000.                                                 |
| <b>Timing</b>                                            | Export declared on 20 March 2027: export tax paid before shipment; any royalty withheld by a third-party exporter on March exports remitted by 15 April 2027.                                                                                                                |

If the cassiterite had been sold to a related trading company abroad below the international market value, RMB and RRA could substitute that value under Article 11.

Value-added tax on the domestic sale to the smelter would be at 0% under Article 7 of the VAT law.

## Questions investors ask about mineral tax and fiscal terms

### What is the mining royalty rate in Rwanda?

Under Article 4 of Law N° 056/2024, 3% of norm value for base metals, including tin, tungsten, tantalum and niobium, and for energy minerals such as lithium; 2% for platinum group metals and rare earth elements; 2% of gross value for gemstones; and 0.5% of norm value for gold. The rates apply since 5 July 2024.

### Is there an export tax on minerals from Rwanda?

Yes, on minerals exported in raw form. Article 5 of Law N° 056/2024 adds 2% of norm value for base metals, platinum group metals and energy minerals, 3% for gemstones, 1% for rare earth elements and 0.5% for gold, paid before export. Processed minerals are exempt at the export point.

### **Who pays the tax on minerals in Rwanda, and when?**

The seller is liable, but a licensed local processing facility or an exporter withholds the royalty and remits it within 15 days after the month of withholding. A miner exporting its own minerals pays both royalty and export tax. The tax is due at the customs export declaration or local purchase, and export tax is paid before export.

### **Can the mineral royalty be deducted for corporate income tax?**

No. Article 6(3) of Law N° 056/2024 provides that the tax on minerals is neither a deductible expense nor an advance on income tax. Corporate income tax at 28% is computed on profit before the royalty and export tax, which raises the effective burden of the mineral tax.

### **Are there tax incentives for mining in Rwanda?**

Some. The Investment Code lets registered exploration licence holders carry losses forward for ten years where exploration is at least half their spending, and lists processing and value addition in mining as a priority activity. The preferential export tax rates do not apply to exporters of unprocessed minerals, and the mineral tax law exempts processed exports.

### **Does the Government take a free stake in Rwandan mining projects?**

Article 49 of Law N° 072/2024 allows a mining licence to entitle the Government to a free carried interest, set by a Ministerial Order that had not been published at 10 October 2026. The Government may also buy shares on agreed terms under Article 48, as in the 25% stake in the 2026 Almonty tungsten venture.

#### **THE 2027 HORIZON**

- The RMB regulation under Article 9(2) of Law N° 056/2024 establishing the mechanism for grade, value and processing charges has not been published; when it appears it will define how norm value is computed for each mineral.
- The Ministerial Order on the Government's free carried interest under Article 49 of Law N° 072/2024 is awaited and would add a State equity term to new mining licences.
- The Regional Economic Integration Framework signed with the DRC on 4 December 2025 envisages harmonised royalties and levies on regional mineral trade; its measures are stated to be instructive rather than prescriptive and no change to Rwandan rates had been made at 10 October 2026 (Strategic minerals and regional deals).
- RMB's December 2025 call for mining-specific investment incentives, and the FY2026/27 budget's reference to rationalising exemptions, may lead to changes in the Investment Code Annex.
- Whether RRA publishes guidance on how the Investment Code capital gains exemption applies to licence transfers after Law N° 014/2025, and how the Commissioner for Customs Services applies the VAT Deferral Facility, in force since 1 August 2026, to mining capital goods, including whether spare parts and consumables are approved.

## Terms you will meet in the documents

| English                           | Kinyarwanda                             | French                                         | Meaning                                                                                                                    |
|-----------------------------------|-----------------------------------------|------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| Tax on minerals                   | <i>Umusoro ku mabuye y'agaciro</i>      | <i>Impôt sur les minerais</i>                  | The mining royalty tax or export tax on the value of minerals produced in a Rwandan mine.                                  |
| Mining royalty tax                | <i>Umusoro w'ikirombe</i>               | <i>Redevance minière</i>                       | The 0.5% to 3% tax under Article 4 of Law N° 056/2024 on every sale of minerals.                                           |
| Export tax                        | <i>Umusoro ku byoherezwa mu mahanga</i> | <i>Taxe à l'exportation</i>                    | The additional 0.5% to 3% tax on minerals exported in raw form, paid before export.                                        |
| Norm value                        | <i>Agaciro nyakuri</i>                  | <i>Valeur normative</i>                        | International market value at the date of the sale certificate, less processing costs approved by RMB.                     |
| Gross value                       | <i>Agaciro mbumbe</i>                   | <i>Valeur brute</i>                            | Value before deducting local processing expenses; the base for the royalty on gemstones.                                   |
| Local mineral processing facility | <i>Uruganda rwo mu Gihugu</i>           | <i>Usine locale de traitement des minerais</i> | A facility licensed by RMB for processing, which withholds the royalty when it buys minerals.                              |
| Grade                             | <i>Ubwiza</i>                           | <i>Teneur</i>                                  | The measured mineral content by reference to the payable factors in the form in which the mineral is sold.                 |
| Tax avoidance arrangement         | —                                       | <i>Arrangement d'évasion fiscale</i>           | An arrangement with a main purpose of obtaining a tax benefit, which RRA may disregard or recharacterise under Article 12. |
| Government free carried interest  | <i>Imigabane ya Leta itishyurirwa</i>   | <i>Intérêt passif de l'Etat</i>                | Free equity for the State in a mining licence under Article 49 of Law N° 072/2024, awaiting a Ministerial Order.           |

## FOREIGN V RWANDAN INVESTOR

The tax on minerals does not depend on nationality. A Rwandan cooperative, a company owned by nationals of another East African Community (EAC) or Common Market for Eastern and Southern Africa (COMESA) state and a foreign-owned company pay the same royalty and export tax, withhold in the same way and face the same rule that the tax is not deductible. Corporate income tax, VAT and the Investment Code incentives also apply equally to registered investors of any origin.

The differences arise on cross-border flows, which mainly concern foreign investors. Dividends, interest, management fees and royalties paid to a foreign parent bear 15% withholding tax unless a treaty applies; sales to a foreign trading affiliate are tested against the international market value under Article 11; and a sale of the foreign holding company is caught by the 10% capital gains tax on indirect transfers. Licensed processors and traders must bank their mineral business through financial institutions in Rwanda under Regulations N° 003/MINES/RMB/2019, and mineral traders are among the businesses allowed to deal in foreign currency under the rules of the National Bank of Rwanda (BNR) (Repatriating profits and capital).

## WATCH OUT FOR

- Modelling the royalty as a deductible cost: under Article 6(3) it is neither deductible nor creditable, so after-tax returns are lower than a simple rate comparison suggests.
- Raw exports of base metals now bear 5% in total, more than the 4% charged under the 2013 law; the saving is only for minerals processed or sold to a local processor.
- Exporting before paying the export tax, or remitting withheld royalty later than 15 days after the month: interest, fines and possible licence suspension follow.
- Selling to a related offtaker below the international market price: RMB and RRA may substitute the market value, and the transfer pricing documentation rules apply.
- Assuming the Investment Code's capital gains exemption covers a licence transfer after the 2025 changes without RRA's confirmation.
- Ignoring Article 49: a free carried interest Order could be issued during the life of a project and affect new licences or renewals.

---

## OFFICIAL SOURCES

- Rwanda Revenue Authority: Law N° 056/2024 of 26/06/2024 establishing tax on minerals (Official Gazette n° Special of 05/07/2024) — [https://www.rra.gov.rw/fileadmin/user\\_upload/Tax\\_on\\_minerals\\_Law\\_of\\_2024.pdf](https://www.rra.gov.rw/fileadmin/user_upload/Tax_on_minerals_Law_of_2024.pdf)
- Rwanda Mines, Petroleum and Gas Board: Law N° 056/2024 establishing tax on minerals (RMB copy) — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Laws/Law\\_no\\_0562024of\\_26062024\\_establishing\\_tax\\_on\\_minerals.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Laws/Law_no_0562024of_26062024_establishing_tax_on_minerals.pdf)
- Rwanda Revenue Authority: Tax on minerals reduced (2024 news release on the new rates) — [https://www.rra.gov.rw/en/details?tx\\_news\\_pi1%5Baction%5D=detail&tx\\_news\\_pi1%5Bcontroller%5D=News&tx\\_news\\_pi1%5Bnews%5D=2149&cHash=9f1c25f70d8de2c6d159c0e762114e0f](https://www.rra.gov.rw/en/details?tx_news_pi1%5Baction%5D=detail&tx_news_pi1%5Bcontroller%5D=News&tx_news_pi1%5Bnews%5D=2149&cHash=9f1c25f70d8de2c6d159c0e762114e0f)
- Rwanda Revenue Authority: Law N° 027/2022 of 20/10/2022 establishing taxes on income — [https://www.rra.gov.rw/fileadmin/user\\_upload/Income\\_Tax\\_law\\_of\\_2022.pdf](https://www.rra.gov.rw/fileadmin/user_upload/Income_Tax_law_of_2022.pdf)
- Capital Market Authority: Law N° 006/2021 of 05/02/2021 on Investment Promotion and Facilitation, with Annex on incentives — [https://cma.rw/fileadmin/user\\_upload/Investment-code-2021.pdf](https://cma.rw/fileadmin/user_upload/Investment-code-2021.pdf)
- Rwanda Revenue Authority: Commissioner General Guidelines for the Implementation of the VAT Deferral Facility (in force 1 August 2026) — [https://www.rra.gov.rw/fileadmin/Folder\\_for\\_2025/CG\\_\\_s\\_Guidelines\\_For\\_Implementation\\_of\\_VAT-July\\_2026.pdf](https://www.rra.gov.rw/fileadmin/Folder_for_2025/CG__s_Guidelines_For_Implementation_of_VAT-July_2026.pdf)
- Ministry of Justice: Official Gazette n° Special of 29/05/2025 (Law N° 014/2025 amending the income tax law, capital gains on licences) — <https://www.minijust.gov.rw/index.php?eID=dumpFile&t=f&f=130496&token=4b9d4de9658212b7aaeeb5c8a42c823a7b879d7b>

## 3T, gold and traceability: proof of origin and the offences for illegally extracted minerals under Law N° 072/2024, the iTSCi tagging system run by RMB since 2010, MCIS export certificates and the ICGLR Regional Certification Mechanism, gold refining, the OECD Due Diligence Guidance, the EU Conflict Minerals Regulation and Dodd-Frank section 1502, and what buyers will ask a Rwandan supplier for

Reviewed 10 October 2026 · Prepared by a commercial lawyer with over 30 years' international experience · Legal and tax information, not legal advice · [How we check](#) · [Open in the app](#)

### WHAT YOU NEED TO KNOW

- Under Article 50 of Law N° 072/2024 of 26/06/2024 on mining and quarry operations, any person caught with minerals without proof of their origin is liable to an administrative fine equal to 10% of their value, and the minerals are confiscated and sold at auction by the Rwanda Mines, Petroleum and Gas Board (RMB).
- Possessing illegally extracted minerals is punishable under Article 64 of Law N° 072/2024 by one to three years' imprisonment and a fine of RWF 30,000,000 to RWF 60,000,000, or RWF 70,000,000 to RWF 90,000,000 for a company, and trading in them under Article 65 by more than five and up to ten years and RWF 60,000,000 to RWF 120,000,000, or RWF 130,000,000 to RWF 150,000,000 for a company, which may also be dissolved.
- RMB has implemented the iTSCi traceability scheme for tin, tantalum and tungsten since December 2010, after a memorandum of understanding with ITRI of 10 September 2010, and works with RCS Global under a memorandum of March 2016; RMB distributes tags and logbooks, weighs and tags minerals at each mine site and keeps the chain-of-custody database.
- Exporters apply online through RMB's Mineral Certification Information System (MCIS) for a Mineral Export Certificate or an ICGLR Mineral Export Certificate under the Regional Certification Mechanism of the International Conference on the Great Lakes Region, which covers cassiterite, wolframite, coltan and gold, and buyers can verify printed certificates with RMB's MCIS mobile application.
- Regulation (EU) 2017/821 has required EU importers of tin, tantalum, tungsten and gold to carry out supply chain due diligence since 1 January 2021, and section 1502 of the United States Dodd-Frank Act requires issuers to report on these minerals originating in the Democratic Republic of the Congo or an adjoining country, which includes Rwanda.

## Why traceability decides market access

Most of Rwanda's mineral output is of the "3T" minerals: **tin** from cassiterite, **tantalum** from coltan and **tungsten** from wolframite. With gold, they are the minerals that international rules treat as potential conflict minerals when they come from the Great Lakes region. Rwanda borders the eastern Democratic Republic of the Congo (DRC), where armed groups have financed themselves from mineral trade, and the same minerals are mined on both sides of the border. Any buyer of Rwandan 3T or gold, whether a smelter in Asia, a refiner in Europe or a manufacturer listed in the United States, therefore needs evidence that a lot was mined in Rwanda, by a licensed operator, and moved through a documented chain of custody.

That evidence has become more important since 2025. In March 2025 the Council of the European Union listed a Kigali gold refinery that its announcement described as responsible for illegally importing gold from M23-controlled regions of the DRC, and in June 2026 the United States Office of Foreign Assets Control (OFAC) designated the same refinery and three Rwandan mining companies, stating that minerals sourced in eastern DRC are smuggled through Rwanda. The Rwandan legal system answers with three tools described in this section: the offences and fines for minerals without proof of origin, the iTSCi tagging system for 3T minerals, and RMB's export certificates under the regional certification mechanism. The sanctions themselves, and the due diligence a buyer, lender or acquirer should run, are covered in [Sanctions, due diligence and reforms](#).

## Proof of origin and the offences

Because all minerals belong to the State until extracted under a licence (Article 3(a) of Law N° 072/2024 of 26/06/2024 on mining and quarry operations), every lot must be traceable to a licensed source. **Article 50** makes it a fault to be caught with minerals **without proof of their origin**: the person is liable to an administrative fine equal to **10% of the value** of the minerals, and the minerals are confiscated so that RMB can sell them at auction. The fault applies to "any person", not only to licence holders, so it reaches transporters, warehouse keepers and unlicensed intermediaries as well as traders and processors.

The criminal offences go further. **Possessing illegally extracted minerals** is punishable by one to three years' imprisonment and a fine of RWF 30,000,000 to RWF 60,000,000, or one of these penalties; a company, cooperative or other legal person faces RWF 70,000,000 to RWF 90,000,000 and may be dissolved (Article 64). **Trading in illegally extracted minerals** is punishable by more than five and up to ten years' imprisonment and RWF 60,000,000 to RWF 120,000,000, or one of these penalties; a legal person faces RWF 130,000,000 to RWF 150,000,000 and may be dissolved (Article 65). In each case the court orders confiscation of the minerals for sale by auction. Mining without a licence, the usual source of illegally extracted minerals, carries two to five years and RWF 25,000,000 to RWF 50,000,000 (Article 63), and a landowner who lets unlicensed miners work its land commits an offence too (Article 66).

Proof of origin rests on records that the law requires in any event. A mining licence holder keeps technical and production records at its address in Rwanda and reports to RMB (Article 24); processing and trading licence holders must keep records of contracts and transactions with miners, suppliers, buyers, smelters, refineries and banks, together with assay reports and customs records, report

quarterly, and send RMB or a designated laboratory a sample of any minerals to be exported (Articles 7 and 12 of Regulations N° 003/MINES/RMB/2019 of 18/07/2019). For 3T minerals, the iTSCi tags and logbooks described below are the practical proof that links a bag to a mine.

#### Provenance faults and offences under Law N° 072/2024

| Conduct                                            | Article    | Individual                                                                            | Company or other legal person                            |
|----------------------------------------------------|------------|---------------------------------------------------------------------------------------|----------------------------------------------------------|
| Being caught with minerals without proof of origin | Article 50 | Administrative fine of 10% of the value; confiscation and auction                     | Same                                                     |
| Mining without a licence                           | Article 63 | 2 to 5 years and RWF 25,000,000 to RWF 50,000,000, or one of these                    | RWF 60,000,000 to RWF 80,000,000; possible dissolution   |
| Possessing illegally extracted minerals            | Article 64 | 1 to 3 years and RWF 30,000,000 to RWF 60,000,000, or one of these                    | RWF 70,000,000 to RWF 90,000,000; possible dissolution   |
| Trading in illegally extracted minerals            | Article 65 | More than 5 and up to 10 years and RWF 60,000,000 to RWF 120,000,000, or one of these | RWF 130,000,000 to RWF 150,000,000; possible dissolution |
| Allowing unlicensed mining on one's land           | Article 66 | 1 to 2 years and RWF 25,000,000 to RWF 50,000,000, or one of these                    | RWF 60,000,000 to RWF 80,000,000; possible dissolution   |
| Late or false reports by a mining licence holder   | Article 51 | Administrative fine of RWF 500,000                                                    | Same                                                     |

## iTSCi in Rwanda: tags, logbooks and RMB's role

The **International Tin Supply Chain Initiative (iTSCi)** is an upstream traceability and due diligence programme developed by the tin industry body ITRI, now the International Tin Association, and operated with the non-governmental organisation Pact. According to RMB, the iTSCi pilot began in the DRC in June 2010, a memorandum of understanding between ITRI and the then Rwanda Natural Resources Authority was signed on 10 September 2010, and the Government implemented iTSCi nationwide in **December 2010**, making Rwanda the first country in the Great Lakes region to commit to nationwide implementation of a traceability and due diligence system. In March 2016 a second memorandum was signed with RCS Global Group, formerly the Better Sourcing Program, to provide supply chain due diligence and assurance services.

In Rwanda the scheme is run through RMB, which describes its role as follows: it distributes and manages **tags and logbooks**, weighs and tags all minerals produced at each mine site of mining companies and cooperatives, records production, follows up on risks, carries out joint inspections with the service providers, and handles the payments and fees related to chain of custody, keeping the chain-of-custody data in a database. Each bag of concentrate therefore carries a tag that links it to a mine and a logbook entry, and every subsequent sale, processing step and export must match that

record. RMB describes iTSCI as a certification scheme for domestically produced 3T minerals that helps buyers meet the Dodd-Frank requirements and the Responsible Minerals Assurance Process (RMAP) used by smelters.

Two cautions apply. First, Be Rwanda Wise FAQ 108 describes ITSCI as run by RMB "jointly with iTSCI across Rwanda, Burundi, the DRC and Uganda"; the accurate position is that RMB runs the system in Rwanda with the iTSCI programme operators and RCS Global as service providers, and each country implements its own arrangements. Second, industry press reported in August 2024 that the Responsible Minerals Initiative (RMI) had suspended, in July 2024, its process for recognising ITSCI as an upstream assurance mechanism, "until 2026 at the earliest". Whether that review has concluded could not be confirmed at 10 October 2026, and some smelters apply additional checks to material from the region. RMB also lists a digital mineral traceability project among its key projects without publishing details; until RMB announces otherwise, iTSCI remains the system in use for 3T minerals. Gold is outside iTSCI, which is a tin, tantalum and tungsten scheme, and relies on licensing, RMB certification and the refiner's own due diligence.

## Export certificates: MCIS and the ICGLR Regional Certification Mechanism

A company allowed to export minerals must request certification services from RMB online, through the **Mineral Certification Information System (MCIS)**, which issues either a **Mineral Export Certificate** or an **ICGLR Mineral Export Certificate**. RMB's MCIS mobile application lets anyone verify that a printed certificate matches the record in MCIS, to prevent the use of fake certificates; a buyer should verify every certificate it receives. Before export, the trader or processor submits a sample of the lot to RMB or a designated laboratory (Regulations N° 003/MINES/RMB/2019), RMB determines grade and value for the tax on minerals, and the export tax on raw minerals is paid before the minerals leave Rwanda (Mineral tax, royalties and fiscal terms).

The **Regional Certification Mechanism (RCM)** of the International Conference on the Great Lakes Region (ICGLR) is a regional standard covering cassiterite, wolframite, coltan and gold. Under it, mine sites are inspected and classified green, yellow or red according to conflict and human rights risk, with a red classification leading to suspension of supplies from that site; chain-of-custody documentation follows each lot; traders report monthly; an independent ICGLR auditor reviews the system; and exports from member States must carry an ICGLR certificate. Rwanda implemented the RCM through Ministerial Regulations N° 002/2012/MINIRENA of 28/03/2012, under which an ICGLR certificate has been required since 15 December 2012. Those Regulations were made under a mining law that has since been repealed twice, and the International Energy Agency's policy database lists them as in force; RMB continues to issue ICGLR certificates through MCIS. Mining licence holders' model agreements under Regulations N° 004/MINES/RMB/2019 require compliance with the ICGLR traceability and certification mechanisms (Mining agreements, local content and community).

## Exporting a lot of 3T minerals from Rwanda

- 1 Licensed source**

Buy only from holders of a valid RMB mining licence, or from licensed traders who can document such a source; check the licence on GIMCS and the mine site's ICGLR status.

---
- 2 Tag at the mine**

RMB weighs and tags each bag at the mine site and records it in the logbook and chain-of-custody database; untagged material cannot be documented.

---
- 3 Document each transfer**

Record every purchase and sale with the counterparty's licence, tag numbers, weights, grades and payments made through financial institutions in Rwanda (Regulations N° 003/MINES/RMB/2019, Article 12).

---
- 4 Sample and value**

Submit a sample to RMB or a designated laboratory; RMB determines grade, value and processing charges for the tax on minerals.

---
- 5 Apply on MCIS**

Request a Mineral Export Certificate or an ICGLR Mineral Export Certificate online through MCIS.

---
- 6 Pay the export tax and clear customs**

For minerals in raw form, declare and pay the export tax before export; lodge the customs export declaration, which fixes the tax point, and pay withheld royalty within 15 days after the month.

---
- 7 Let the buyer verify**

Send the certificate and chain-of-custody documents; the buyer can verify the certificate with the MCIS mobile application.

---
- 8 Report**

File quarterly reports to RMB under the 2019 Regulations and keep all records for inspection and audit.

---

## Gold: refining, taxation and heightened scrutiny

Gold is treated more lightly by the tax law and more strictly by everyone else. The tax on minerals on gold is 0.5% royalty plus, for raw exports, 0.5% export tax, against 6% under the 2013 law, and imported gold re-exported from Rwanda is expressly excluded from the exemption that applies to other imported minerals (Article 7(2) of Law N° 056/2024 of 26/06/2024 establishing tax on minerals). RMB stated in December 2025 that refining of gold, tin and tantalum was already operational in Rwanda, and processing licences under Regulations N° 003/MINES/RMB/2019 allow licensed refiners to import minerals in accordance with the relevant laws.

The sanctions history makes gold the highest-risk mineral in a Rwandan supply chain. On **17 March 2025** the Council of the European Union listed Gasabo Gold Refinery in Kigali, as "responsible for illegally importing gold from M23-controlled regions in the DRC", together with the then Chief Executive Officer of RMB, subjecting them to an asset freeze and travel ban. On **25 June 2026** OFAC designated Gasabo Gold Refinery LTD under Executive Order 13413, as amended, together with its chairman Jean Malic Kalima, its general manager Bosco Kayobotsi, and three companies it described as controlled by the chairman, Bugambira Mines LTD, Wolfram Mining and Processing LTD and Rwinkwavu Mining Corporation LTD. OFAC stated that at least 60 kg of gold were moved from eastern DRC to Gasabo Gold in early 2026, and that entities owned 50% or more by blocked persons are also blocked. A Rwandan export licence or RMB certificate does not protect a buyer that deals with a designated person; screening against the current lists is a separate step ([Sanctions, due diligence and reforms; Anti-money laundering and sanctions compliance](#)).

## The OECD Guidance and what buyers expect

The reference standard for responsible sourcing from conflict-affected areas is the **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas**. The Rwanda Development Board (RDB) states that Rwanda adheres to it, and in the Regional Economic Integration Framework signed with the DRC on 4 December 2025 both States committed to apply it and to make full use of the ICGLR RCM, with mine-to-export traceability and third-party audits ([Strategic minerals and regional deals](#)). The Guidance is not itself Rwandan law, but it is the standard that downstream rules and smelter audit programmes adopt, so a Rwandan supplier is in practice assessed against it.

For an upstream supplier, that means a written supply chain policy, a management system that identifies the mine of origin of every lot, an assessment of risks such as payments to armed groups, smuggled material entering the chain, child labour and serious human rights abuses, a plan to respond to the risks found, cooperation with audits of the smelters and refiners it supplies, and annual public reporting. Buyers will ask for documents that show each of these elements, and the table below lists the usual ones. Payments for minerals should go through formal financial institutions, as Regulations N° 003/MINES/RMB/2019 already require of licensed traders and processors and as the 2025 regional framework envisages for the whole region.

### What a buyer, smelter or refiner will ask a Rwandan supplier for

| Document or check                                                | Issued or held by             | Why it matters                                                    |
|------------------------------------------------------------------|-------------------------------|-------------------------------------------------------------------|
| Mining, trading or processing licence, with term and coordinates | RMB, through GIMCS            | Shows the supplier may lawfully extract, buy or sell the minerals |
| iTSCi tag numbers and logbook records for each lot               | RMB and the iTSCi operators   | Links each bag to a mine site and production record               |
| Mine site status under the ICGLR RCM                             | ICGLR inspection, through RMB | Shows the site is not red-flagged for conflict or abuse risk      |

| Document or check                                                    | Issued or held by                                             | Why it matters                                                                      |
|----------------------------------------------------------------------|---------------------------------------------------------------|-------------------------------------------------------------------------------------|
| Mineral Export Certificate or ICGLR Mineral Export Certificate       | RMB, through MCIS; verifiable with the MCIS app               | Confirms RMB has certified the lot for export                                       |
| Assay or sample report                                               | RMB or a designated laboratory                                | Supports grade, value and the tax on minerals                                       |
| Customs export declaration and tax receipts                          | Rwanda Revenue Authority (RRA)                                | Shows royalty and export tax paid and the export lawful                             |
| Beneficial ownership information                                     | RDB beneficial ownership register; supplier's own declaration | Needed for sanctions screening and the 50% ownership rule                           |
| Sanctions screening of supplier, owners, managers and counterparties | Buyer's own checks against EU, OFAC and United Nations lists  | A licence or certificate gives no protection against a designation                  |
| Payment trail through banks in Rwanda                                | Supplier and its bank                                         | Required of licensed traders and processors; reduces the risk of informal financing |

## Foreign rules that reach Rwandan exporters

**Regulation (EU) 2017/821**, the EU Conflict Minerals Regulation, has applied since 1 January 2021 to EU importers of tin, tantalum, tungsten and gold above set volumes. It requires them to carry out supply chain due diligence based on the OECD Guidance, with third-party audits and reporting, which they pass upstream to their suppliers through contract terms and information requests. The European Commission recognised the RMI's Responsible Minerals Assurance Process as an industry due diligence scheme on 16 October 2025, and in 2026 began procurement for a review of the Regulation, with a prior information notice of 11 May 2026 and a call for tenders of 16 June 2026. The EU and Rwanda signed a memorandum of understanding on sustainable raw materials value chains on 19 February 2024; members of the European Parliament asked for its suspension in February 2025, and its current status could not be confirmed ([Strategic minerals and regional deals](#)).

In the United States, **section 1502 of the Dodd-Frank Act**, codified at 15 U.S.C. §78m, requires issuers that use tin, tantalum, tungsten or gold in their products to report whether the minerals originated in the "Democratic Republic of the Congo or an adjoining country", which includes Rwanda, on Form SD. Securities and Exchange Commission staff no-action relief has limited enforcement of parts of the rule since April 2017, but issuers still file Form SD, and filings for the 2025 calendar year were due by 1 June 2026. The duty falls on the issuer, not on the Rwandan exporter, but the issuer's due diligence travels down the chain to the smelter and from the smelter to its Rwandan suppliers, as [Be Rwanda Wise FAQ 109](#) explains ([FAQ 109](#)).

## Red flags in a Rwandan 3T or gold supply chain

Circumstances that should lead a buyer, lender or acquirer to stop and investigate before proceeding.

☐ **Volumes out of line with the source**

Output from a mine or a trader that exceeds its known production capacity, licence area or history.

☐ **Missing or reused tags**

Bags without iTSCI tags, tags that do not match the logbook, or certificates that fail verification on the MCIS application.

☐ **Cash and intermediaries**

Payments in cash or through unlicensed intermediaries, contrary to the duty to bank through institutions in Rwanda.

☐ **Imported material**

Concentrate or gold described as imported from the DRC or elsewhere, which needs its own origin documents and, for gold, bears the tax on minerals on re-export.

☐ **Links to designated persons**

Any ownership, management, supply or refining link to persons listed by the EU or OFAC, including companies 50% or more owned by them.

☐ **Unlicensed source**

A seller unable to show a valid RMB licence or a documented chain from a licensed mine, which exposes the holder to Articles 50, 64 and 65.

## WORKED EXAMPLE

### The cost of a lot without proof of origin, against the cost of compliance

A licensed Kigali trader is stopped while moving 2,000 kg of cassiterite concentrate valued at RWF 60,000,000. It cannot produce tags or purchase records showing origin. Illustrative figures only.

|                                          |                                                                                                                                                                          |
|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Administrative fine                      | $10\% \times \text{RWF } 60,000,000 = \text{RWF } 6,000,000$ (Article 50).                                                                                               |
| Confiscation                             | The concentrate, worth RWF 60,000,000, is confiscated and auctioned by RMB.                                                                                              |
| Total immediate loss                     | $\text{RWF } 6,000,000 + \text{RWF } 60,000,000 = \text{RWF } 66,000,000$ , before any criminal case.                                                                    |
| If the minerals were illegally extracted | The trading company faces a fine of RWF 130,000,000 to RWF 150,000,000 and possible dissolution (Article 65); its managers more than 5 and up to 10 years' imprisonment. |
| Licence consequences                     | Breach of licence terms is a ground for cancellation (Article 53(c)); the export certificates and banking relationships of the business are also at risk.                |

**The compliant alternative**

With tags and records, the same lot exported raw with a norm value of RWF 60,000,000 bears royalty of 3% (RWF 1,800,000) plus export tax of 2% (RWF 1,200,000): RWF 3,000,000 in total under Law N° 056/2024.

The comparison shows why buyers and lenders insist on tags and certificates for every lot: the tax cost of documented minerals is a small fraction of the loss on undocumented ones.

A buyer abroad that had paid for the confiscated lot would have a contractual claim against the trader but no right to the minerals.

## Questions investors ask about 3T, gold and traceability

### What happens if minerals are found without proof of origin in Rwanda?

Under Article 50 of Law N° 072/2024 the person holding them pays an administrative fine of 10% of their value and the minerals are confiscated and sold at auction by RMB. If the minerals were illegally extracted, possessing them is an offence punishable by up to three years and trading in them by up to ten years.

### Who runs iTSCi in Rwanda?

RMB. It distributes and manages tags and logbooks, weighs and tags minerals at each mine site, and keeps the chain-of-custody database, working with the iTSCi programme operators and with RCS Global under a 2016 memorandum. Rwanda implemented iTSCi nationwide in December 2010. iTSCi covers tin, tantalum and tungsten, not gold.

### What certificate is needed to export minerals from Rwanda?

An export certificate issued by RMB through its online Mineral Certification Information System (MCIS): a Mineral Export Certificate or an ICGLR Mineral Export Certificate under the regional certification mechanism for cassiterite, wolframite, coltan and gold. Buyers can verify the printed certificate with RMB's MCIS mobile application.

### Does the EU Conflict Minerals Regulation apply to Rwandan exporters?

Not directly. Regulation (EU) 2017/821 binds EU importers of tin, tantalum, tungsten and gold above set volumes, since 1 January 2021. They must carry out due diligence based on the OECD Guidance, so they will require Rwandan suppliers to provide origin, chain-of-custody and audit information.

### Is Rwanda covered by Dodd-Frank conflict minerals reporting?

Yes. Section 1502 covers minerals originating in the Democratic Republic of the Congo or an adjoining country, which includes Rwanda. The reporting duty falls on issuers filing Form SD with the United States Securities and Exchange Commission, which pass due diligence requests down to smelters and their Rwandan suppliers.

## Is gold from Rwanda subject to sanctions?

Not as such, but specific Rwandan actors are. The EU listed Gasabo Gold Refinery in March 2025, and OFAC designated it, its chairman and general manager and three Rwandan mining companies in June 2026; companies 50% or more owned by them are also blocked. Every gold transaction should be screened against current lists.

### THE 2027 HORIZON

- The outcome of the RMI's review of ITSCI recognition, suspended in July 2024 "until 2026 at the earliest", will affect how smelters treat Rwandan 3T material; check RMI's published position before contracting.
- RMB's digital mineral traceability project and its upgrade of MCIS, listed as key projects, may change how tags, certificates and data are handled; watch RMB announcements.
- The European Commission's review of Regulation (EU) 2017/821, for which it published a prior information notice on 11 May 2026 and a call for tenders on 16 June 2026, may change the scope, thresholds or due diligence expectations for EU importers.
- The Regional Economic Integration Framework with the DRC envisages end-to-end digital traceability, joint traceability for artisanal mining and third-party audits; its implementation depends on the security conditions set in the framework and had not produced new Rwandan rules at 10 October 2026.
- Further EU or OFAC designations remain possible while the conflict in eastern DRC continues; screening must be repeated, not done once.

## Terms you will meet in the documents

| English                                    | Kinyarwanda                                                                  | French                                              | Meaning                                                                                                      |
|--------------------------------------------|------------------------------------------------------------------------------|-----------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| Failure to indicate the origin of minerals | <i>Kutagaragaza inkomoko y'amabuye y'agaciro</i>                             | <i>Défaut d'indiquer l'origine des minerais</i>     | The Article 50 fault of holding minerals without proof of origin, sanctioned by a 10% fine and confiscation. |
| Possessing illegally extracted minerals    | <i>Gutunga amabuye y'agaciro yacukuwe mu buryo bunyuranyije n'amategeko</i>  | <i>Possession de minerais extraits illégalement</i> | The Article 64 offence, punishable by one to three years and a fine.                                         |
| Trading in illegally extracted minerals    | <i>Gucuruza amabuye y'agaciro yacukuwe mu buryo bunyuranyije n'amategeko</i> | <i>Commerce de minerais extraits illégalement</i>   | The Article 65 offence, punishable by more than five and up to ten years and a fine.                         |
| Administrative fine                        | —                                                                            | <i>Amende administrative</i>                        | A fine imposed by RMB for a fault, as distinct from a criminal fine imposed by a court.                      |

| English                 | Kinyarwanda                                     | French                           | Meaning                                                                                                          |
|-------------------------|-------------------------------------------------|----------------------------------|------------------------------------------------------------------------------------------------------------------|
| Mineral ore samples     | <i>Indobanywa y'amabuye y'agaciro</i>           | <i>Échantillons de minerais</i>  | Minerals taken from a lot for analysis of its quality; samples for export within RMB limits are exempt from tax. |
| Mineral trading licence | <i>Uruhushya rwo gucuruza amabuye y'agaciro</i> | <i>Permis de commerce minier</i> | The RMB licence needed to buy, sell, import and export minerals.                                                 |
| Mineral processing      | <i>Gutunganya amabuye y'agaciro</i>             | <i>Traitement des minerais</i>   | Cutting, polishing, smelting or other processing in a facility to create new products from minerals.             |
| Export tax              | <i>Umusoro ku byoherezwa mu mahanga</i>         | <i>Taxe à l'exportation</i>      | The tax on minerals exported in raw form, paid before export under Law N° 056/2024.                              |

## FOREIGN V RWANDAN INVESTOR

The traceability rules do not differ by nationality. A Rwandan cooperative, a trader owned by nationals of another East African Community (EAC) or Common Market for Eastern and Southern Africa (COMESA) state and a foreign-owned smelter must all prove the origin of every lot, use the same tags and certificates and face the same fines and offences. Every trader needs the Rwandan franc equivalent of USD 250,000 in a local bank and must bank its mineral business in Rwanda.

The practical burden falls more heavily on foreign-facing businesses. Buyers subject to Regulation (EU) 2017/821, Dodd-Frank section 1502 or OFAC sanctions will impose due diligence, audit and screening terms that a supplier selling only within Rwanda would not meet. A foreign investor acquiring or financing a Rwandan mineral business also carries its home-country sanctions exposure: a United States or EU person must not deal with designated persons wherever the transaction takes place, so its diligence must go beyond what RMB's licence and certificate show. Material imported from neighbouring countries, including EAC members, needs its own origin documents, and imported gold bears the tax on minerals when re-exported.

## WATCH OUT FOR

- Treating an RMB certificate as a sanctions clearance: it confirms the lot's certification, not that the supplier, its owners or its refiner are free of EU or OFAC designations.
- Buying from intermediaries who cannot show tags, logbook entries and a licensed source: the 10% fine and confiscation under Article 50 apply to whoever holds the minerals.
- Assuming the RMI still recognises iTSCI without checking: the recognition process was suspended in July 2024, and smelters may require more.
- Mixing imported concentrate or gold with Rwandan production without separate documentation.
- Relying on Be Rwanda Wise FAQ 108's description of a four-country joint scheme: iTSCI is implemented in Rwanda through RMB, with its own records.
- Paying suppliers in cash: licensed traders and processors must bank through financial institutions in Rwanda, and cash trails are a red flag for every downstream auditor.

## OFFICIAL SOURCES

- Rwanda Mines, Petroleum and Gas Board: Mineral traceability (iTSCI, RCS Global, tags and logbooks) — <https://www.rmb.gov.rw/1/mineral-traceability>
- Rwanda Mines, Petroleum and Gas Board: Sites and Apps (MCIS portal and mobile application, GIMCS) — <https://www.rmb.gov.rw/sites-apps-1>
- Rwanda Mines, Petroleum and Gas Board: Law N° 072/2024 of 26/06/2024 on mining and quarry operations (Articles 50 and 63 to 66) — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Laws/Law\\_n\\_\\_0722024of\\_26062024\\_on\\_mining\\_and\\_quarry\\_operations.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Laws/Law_n__0722024of_26062024_on_mining_and_quarry_operations.pdf)
- US Department of the Treasury: OFAC designations of Gasabo Gold Refinery and Rwandan mining companies (25 June 2026) — <https://home.treasury.gov/news/press-releases/sb0543>
- Council of the European Union: DRC sanctions listings, including Gasabo Gold Refinery (17 March 2025) — <https://www.consilium.europa.eu/en/press/press-releases/2025/03/17/democratic-republic-of-the-congo-eu-lists-further-nine-individuals-and-one-entity/>
- European Commission: Conflict Minerals Regulation (EU) 2017/821 — [https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation\\_en](https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation_en)

Mining agreements, local content and community: the RMB agreement under Article 73 of Law N° 072/2024, the 2019 model agreements and KIAC arbitration, the 70% Rwandan staffing rule and 10% supplier preference, District community development plans, ESIA under Ministerial Order N° 003/MoE/25, the 10%/90% rehabilitation guarantee, safety, explosives and artisanal mining

Reviewed 10 October 2026 · Prepared by a commercial lawyer with over 30 years' international experience · Legal and tax information, not legal advice · [How we check](#) · [Open in the app](#)

## WHAT YOU NEED TO KNOW

- Article 73 of Law N° 072/2024 of 26/06/2024 on mining and quarry operations requires the Rwanda Mines, Petroleum and Gas Board (RMB) to sign an agreement with every holder of a licence for industrial mining or quarry operations 'to perfect' its rights and obligations, and the model agreements annexed to Regulations of the CEO N° 004/MINES/RMB/2019 of 18/07/2019, still applied by RMB, choose Rwandan law, 30 days of amicable settlement and then arbitration under the rules of the Kigali International Arbitration Centre (KIAC), seated in Kigali, before one or three arbitrators.
- Article 72 of Law N° 072/2024 obliges every licence holder to prefer Rwandan contractors and Rwandan-made materials where rates, quality and delivery are competitive and to report on compliance, and the 2019 large-scale model agreement adds that at least 70% of non-manual employees and contractors must be Rwandan, that a Rwandan must be trained within 3 years for any post no Rwandan can yet fill, that manual and unskilled posts are reserved to Rwandans, and that Rwandan goods and services priced within 10% of a foreign offer must be preferred.
- Under Article 74 of Law N° 072/2024 a mining or quarry licence holder prepares a plan for development and social welfare with the authorities of the District where it operates and submits the agreed plan to RMB, and the 2019 model agreement allows an implementation agreement with the District.
- Article 38 of Law N° 072/2024 requires holders of exploration, mining, processing and commercial or industrial quarry licences to submit an approved environmental and social impact assessment before starting operations, and since Ministerial Order N° 003/MoE/25 of 19/08/2025 the certificate is applied for online through the Rwanda Development Board (RDB) One Stop Centre.
- Regulations of the CEO N° 001/MINES/RMB/2019 of 18/07/2019 require a rehabilitation guarantee equal to the liabilities in the environmental management plan, in cash or a bank guarantee, 10% non-refundable and 90% refundable, deposited with the National Fund for Environment before operations, and Article 55 of Law N° 072/2024 punishes a mining licence holder that fails to rehabilitate with an administrative fine of RWF 5,000,000 to RWF 10,000,000 and an order to make restitution.
- Article 43 of Law N° 072/2024 requires prior authorisation of the Minister in charge of internal security, on RMB's recommendation, to import, transport, trade or use dynamites in mining or quarry operations, with an administrative fine of RWF 5,000,000 to RWF 10,000,000 for unauthorised transfer or use of expired dynamites (Article 61) and 5 to 7 years' imprisonment and a fine of RWF 40,000,000 to RWF 75,000,000 for handling them without a permit (Article 70).

## Three layers: the licence, the law and the agreement

A mining project in Rwanda is governed by three instruments that must be read together. The first is the licence itself, granted by the **Rwanda Mines, Petroleum and Gas Board (RMB)** under **Law N° 072/2024 of 26/06/2024 on mining and quarry operations** (the Mining Law), published in the Official Gazette n° Special of 24/07/2024 and in force since that date (Article 78); licences and their terms are explained in [Mining licences and quarry licences](#). The second is the Mining Law and the regulations made under it. The third is an agreement between RMB and the licence holder. Article 73(1) provides that the competent organ, which is RMB, enters into an agreement with the holder of a licence for industrial mining or quarry operations 'to perfect the licence holder's rights and obligations', and Article 73(2) leaves the content of that agreement to RMB regulations.

No regulation under Article 73 had been published by 10 October 2026. In practice RMB continues to apply **Regulations of the CEO N° 004/MINES/RMB/2019 of 18/07/2019** determining the format and content of a mineral licence and the content of an agreement with a mining or industrial quarry licence holder, published in the Official Gazette n° 29 bis of 29/07/2019 under the repealed Law n° 58/2018. Those Regulations annex model agreements: Annex II for exploration, Annex III for large-scale mining, Annex IV for medium-scale mining and Annex V for small-scale mining. The Mining Law saves existing licences until they expire (Article 75) but contains no general clause preserving the 2019 regulations, so their continued force rests on RMB's practice rather than an express statutory saving. An investor should treat the model as the starting text RMB will table, check with RMB which version it is using, and expect the eventual Article 73 regulations to replace it.

The agreement does not displace the law: nothing in it allows the parties to derogate from laws on anti-corruption, human rights and national security (Article 27 of Annex III), and RMB keeps its statutory powers to fine, suspend and cancel (Article 28). What it adds is precision: the work and investment commitment, the employment, procurement and community plans and the amount of the rehabilitation guarantee become contractual obligations whose breach is a ground for termination.

## What the model mining agreement contains

The Annex III model for large-scale mining runs to 41 articles. Before mining starts the licensee must satisfy **conditions precedent** (Article 2): an environmental management plan submitted to RMB, proof of payment of the environmental rehabilitation guarantee, resettlement or compensation of affected landowners and lawful occupiers in accordance with Rwandan law, and RMB's written approval of the Minimum Work and Investment Commitment. The agreement lasts for the licence period, including renewals (Article 3).

Among the licensee's obligations (Article 4) are starting mining operations within 180 days of the licence, complying with child labour and gender laws, obtaining every environmental approval before an activity that may affect land, air, water or forest, notifying RMB within 7 days of any discovery of radioactive minerals or of archaeological or historical objects, and complying with the traceability and certification mechanisms of the International Conference on the Great Lakes Region (ICGLR), described in [3T, gold and traceability](#). The licensee's rights (Article 5) include the exclusive right to mine the minerals in the licence, to build plant and facilities, to continue operating while a renewal application is pending, and to open and operate bank accounts, including in foreign currency, and transfer or repatriate funds, subject to transfer pricing and anti-avoidance rules.

The **Government assurances** in Article 6 are limited: permits are to be issued on a timely basis in accordance with applicable laws, and the Government will not expropriate the licensee's capital, property and assets except for public interest, on a non-discriminatory basis, under due process of law and with prompt, adequate and effective compensation. Annual licence fees and surface rent are paid in advance by 31 December for the following year (Article 9). The licensee must give RMB and the Rwanda Revenue Authority (RRA) its smelting, refining and sales contracts and an annual sales report (Article 18), deal with affiliates at arm's length (Article 19), and obtain RMB's prior written consent to any transfer, assignment or mortgage of the licence or of shares in the licensee; a change of control is treated as a transfer and an unapproved one is void (Article 20). The model contains no clause freezing the law at signature. The nearest equivalent is the review clause in Article 30, under which either party

may call for good-faith consultation on a 'critical matter', defined as a change in economic, political or social circumstances so fundamental that the expected balance of benefits can no longer be achieved; any amendment must be agreed.

## Disputes, force majeure and termination

The model is governed by the laws of the Republic of Rwanda (Article 31). A dispute must first be the subject of an attempt at amicable settlement for **30 days** from notice; failing settlement, it is resolved by arbitration under the Rules of Arbitration of the **Kigali International Arbitration Centre (KIAC)**, before one arbitrator or three as the parties agree, seated in Kigali, in Kinyarwanda, English or French, and the award is final, binding and enforceable in any competent court (Article 32). The procedure and the enforcement of KIAC awards are explained in Arbitration law and KIAC. A foreign investor whose home State has an investment treaty with Rwanda may also have treaty rights that sit alongside the contractual clause (Investor-State disputes and treaty protection).

A party affected by force majeure must notify the other within 48 hours of its start and of its end, and either party may terminate if it continues for more than 180 days (Article 33). The licensee may terminate on at least **90 days' notice** if, in its reasonable consideration, the mine can no longer be worked economically (Article 25.2). RMB may terminate on twelve listed grounds, including persistent non-payment of royalties, taxes or rent, failure to comply with the approved environmental and social management plan, false information, failure to maintain the rehabilitation guarantee or insurance, failure without justification to meet the Minimum Work and Investment Commitment, an unapproved transfer, insolvency, and corrupt, fraudulent, collusive, coercive or obstructive practices in obtaining the licence or performing the agreement (Article 25.3). Before terminating, RMB must give 30 days' written notice to remedy and, if the breach is not remedied, 30 days' notice of termination (Article 25.4). That 30-day cure period comes from the model agreement, not from the Mining Law, whose cancellation grounds in Article 53 carry no cure period.

The consequences on termination are severe and should be priced into any financing. Unless RMB decides otherwise, all buildings, structures, installations and fixtures in the licence area become the property of the Government without compensation and free of mortgages; the Government may buy any movable plant, equipment and supplies within **30 days** at the lower of fair market value and net depreciated book value for income tax purposes; and anything not bought or removed within 60 days also passes to the Government (Article 26). A lender taking security over fixed plant should therefore negotiate RMB's consent and a step-in right before financial close.

## Local content: Rwandan staff, contractors and goods

The statutory rule is in Article 72 of the Mining Law, which applies to every licence holder. It must give preference to **Rwandan contractors** for works and services where their rates, quality and delivery schedule are competitive with foreign contractors, give preference to **materials produced in Rwanda** where they are similar in quality, quantity and price to imported ones, and provide periodic reports to RMB on compliance. Article 72 contains no percentage; the figures come from the model agreements.

On people, Article 13 of the Annex III model requires the licensee to comply with the employment and skills transfer plan approved with the licence and to ensure that at least **70%** of its employees, workers, contractors and sub-contractors engaged otherwise than as manual or unskilled labourers are Rwandans. Where the licensee shows RMB that no Rwandan has the skills for a particular position, it must ensure that a Rwandan is trained to occupy it within **3 years**. No one other than a Rwandan may be engaged in a manual or unskilled position, no child may be employed, employment practices must comply with Rwandan employment, labour, gender and human rights laws, and an annual report must show the total workforce by nationality and category and the training and skills transferred. These commitments sit on top of the general immigration rules for foreign staff, explained in [Work permits and residence permits](#).

On goods and services, Article 14 of the model requires compliance with the **procurement plan for local goods and services and value addition** approved with the licence, and preference for goods and services produced or supplied by a Rwandan where they meet the relevant standard and the price is within **10%** of the price of the same goods or services from a non-Rwandan (the text reads 'not more than ten (10%) percent of the price', which is applied as a 10% margin). The licensee must cooperate with RMB and other agencies in identifying goods and services that Rwandan suppliers can develop and in supplier capacity programmes, and report on compliance with the plan within 30 days after the end of each calendar year. The value-addition element links to the fiscal regime: processing and value addition in mining is a priority activity under the Investment Code, raw exports bear an additional export tax under Law N° 056/2024, and the 15% exporter rate does not apply to exporters of unprocessed minerals ([Mineral tax, royalties and fiscal terms](#); [FAQ 107](#)).

## Community: the development and social welfare plan

Article 74 of the Mining Law requires the holder of a licence for mining or quarry operations to prepare a **plan for development and social welfare** in collaboration with the authorities of the District where it operates, and to submit the plan agreed with the District to the authority that issued the licence. A community development plan is also one of the documents RMB's mining licence application form requires. Article 17 of the Annex III model adds that the plan must be consistent with the District's own development plan, may be revised in collaboration with the local authorities, and may be implemented through an agreement between the licensee and the District. Neither the law nor the model sets a minimum spend or a percentage of revenue; the content is negotiated, and RMB and the District will compare it with the scale of the project.

Landowners are dealt with separately. Under Article 3(a) of the Mining Law all rights of ownership and control of minerals in, under or upon any land are vested in the State notwithstanding private ownership of the land, and Article 4 requires a mining licence holder to pay the landowner or lawful occupier fair compensation before operations start, after which the land is registered to the State; for exploration and quarrying a written lease is used and the land is returned afterwards. The model agreement repeats the duty to avoid disturbance and to pay fair and adequate compensation where damage cannot be avoided (Article 29), and compensation or resettlement of affected occupiers is a condition precedent to mining. Where agreement cannot be reached, Article 5 of Law N° 32/2015 of 11/06/2015 relating to expropriation in the public interest lists 'minerals and other natural resources in the public domain' among the activities of public interest, and its valuation rules and deadlines are explained in [Expropriation and compensation](#).

## Environmental and social impact assessment

Article 38 of the Mining Law requires the holder of an exploration licence, a small-, medium- or large-scale mining licence, a mineral processing licence, or a commercial small-scale or industrial quarry licence, before starting operations, to submit to RMB the report on the **environmental impact assessment and social welfare** study approved by the relevant official. The procedure is now set by **Ministerial Order N° 003/MoE/25 of 19/08/2025** relating to environmental and social impact assessment, which, according to press reports of September 2025, replaced the 2019 order. RDB's published procedure has four stages: an online application through the RDB One Stop Centre, a site visit by RDB, a study carried out by licensed experts, and the issue of RDB's certificate with signed conditions of approval. Reports on the 2025 Order describe expanded social content, including gender, labour, resettlement and grievance mechanisms; the full text of the Order should be checked for the precise requirements.

The assessment is the base for much of what follows. The environmental management plan that a mining application must contain is drawn from it, the rehabilitation duty in Article 39 is measured against it, and the amount of the rehabilitation guarantee equals the liabilities in that plan. A project that changes its mine plan, adds a processing plant or expands its footprint should expect to revisit its certificate before doing so, because Article 4 of the model agreement requires every environmental approval to be in place before an activity that may affect land, air, water or forest resources.

## Rehabilitation and the guarantee

Article 39 binds every licence holder to rehabilitate and reinstate boreholes and excavations, replant, remove buildings and level any area affected by exploration, mining or quarrying, on the basis of the environmental impact assessment and the environment law. Article 40 requires a **rehabilitation plan** with planned activities and a budget, and keeps the holder liable for environmental protection until a final rehabilitation certificate is issued by the authority in charge of environmental protection, the Rwanda Environment Management Authority (REMA). Article 41 requires a **rehabilitation guarantee** whose nature, amount and deposit are set by RMB regulations.

Pending new regulations RMB applies **Regulations of the CEO N° 001/MINES/RMB/2019 of 18/07/2019** determining the nature, amount and deposit of the environmental rehabilitation guarantee. The guarantee may be a cash deposit or a bank guarantee (Article 3), and its amount must equal the liabilities of the licence holder under the environmental management plan (Article 4). The holder sets the rehabilitation budget by reference to the value of the environment that may be degraded; if the RMB Chief Executive Officer finds the budget intentionally or erroneously undervalued, the holder must revise it at its own cost (Article 5). The guarantee is composed of **10% non-refundable** and **90% refundable** (Article 6), and is deposited in the account of the National Fund for Environment before operations start (Article 7). After completing rehabilitation the holder asks the environmental authority for a certificate of completion; three years after that certificate it may ask for a certificate of non-outstanding liabilities (Article 8), and with that certificate it applies to the National Fund for Environment for the refund (Article 9).

Failure to rehabilitate exposes a mining licence holder to an administrative fine of RWF 5,000,000 to RWF 10,000,000 and an order to make restitution, and, where infrastructure or community property is damaged, an order to rehabilitate or compensate it (Article 55); the quarry equivalent is RWF 3,000,000 to RWF 5,000,000 (Article 60). Closure must be planned: the Mining Law requires notice to RMB one year before closure, and after cancellation of a licence the holder has 90 days to rehabilitate and clear its liabilities (Article 37).

## Health, safety and explosives

Article 42 requires the licence holder to ensure that the mine is commissioned, maintained and decommissioned without compromising the health and safety of workers and others, and that everyone working there has the necessary skills, competence and resources. An authorised officer who considers that operations endanger anyone may take an urgent decision requiring the danger to be rectified immediately or operations to be suspended until it is removed; the holder may appeal to the head of the organ that issued the licence. Failing to insure employees, to pay them in accordance with the law or to provide protective equipment leads to **provisional suspension** of the licence (Article 52), and non-compliance with health, safety and environmental standards to a fine of RWF 1,000,000 to RWF 3,000,000, or RWF 3,000,000 to RWF 5,000,000 if it causes environmental destruction (Article 62). RMB publishes Mining Safety Standards and occupational health and safety guidelines that set the operating detail ([FAQ 111](#)).

Article 43 requires the prior authorisation of the Minister in charge of internal security, on RMB's recommendation, for the import, export, manufacture, transport, trade, transfer or use of dynamites in mining and quarry operations, and prohibits expired dynamites. RMB still lists Ministerial Order N° 013/MOJ/AG/19 of 16/07/2019 on dynamites, and its online system takes applications for blasting recommendations. Unauthorised transfer or use of expired dynamites is an administrative fault punished by a fine of RWF 5,000,000 to RWF 10,000,000 (Article 61); handling them without a permit is an offence punished by 5 to 7 years' imprisonment and a fine of RWF 40,000,000 to RWF 75,000,000, or RWF 80,000,000 to RWF 100,000,000 for a company (Article 70).

## Artisanal and small-scale mining in the supply chain

Rwandan law has no separate artisanal mining permit. The formal route for artisanal and small-scale miners is the small-scale mining licence, of up to 50 hectares under Article 8 of the Mining Law, which Article 9 of Regulations of the CEO N° 005/MINES/RMB/2019 of 18/07/2019 reserves to mines 'owned by Rwandan nationals'. Secondary sources estimate that artisanal and small-scale operations account for about 80% of the sector. A foreign investor therefore meets artisanal production mainly as a buyer, trader, processor, service provider or, for a large-scale licensee, as a neighbour whose ground may be worked by others.

The criminal provisions make that interface sensitive. Mining without a licence is punished by 2 to 5 years' imprisonment and a fine of RWF 25,000,000 to RWF 50,000,000, or RWF 60,000,000 to RWF 80,000,000 for a company, which the court may dissolve (Article 63); allowing unlicensed mining on one's land by 1 to 2 years (Article 66); possessing illegally extracted minerals by 1 to 3 years (Article 64); and trading in them by more than 5 and up to 10 years and a fine of RWF 60,000,000 to RWF 120,000,000, or RWF 130,000,000 to RWF 150,000,000 for a company (Article 65). Minerals found

without proof of origin attract an administrative fine of 10% of their value and are confiscated for auction (Article 50). A buyer from small-scale producers therefore needs licence checks, traceability documents and the due diligence described in [Sanctions, due diligence and reforms](#). The December 2025 Regional Economic Integration Framework between Rwanda and the Democratic Republic of the Congo commits both States to formalising artisanal and small-scale mining, including through cooperatives and joint traceability ([Strategic minerals and regional deals](#)).

### Agreement, local content and community obligations at a glance

| Obligation                      | Source                                                        | What it requires                                                                                                                          | Consequence of breach                                                                   |
|---------------------------------|---------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|
| Agreement with RMB              | Art 73 Mining Law; Reg. 004/ MINES/RMB/ 2019, Annexes II to V | Signed agreement for industrial mining or quarry licences; model text tabled by RMB                                                       | Termination grounds and RMB sanctions under the agreement (Arts 25 and 28 of Annex III) |
| Conditions precedent            | Art 2, Annex III                                              | Environmental management plan, proof of guarantee, landowner compensation, approved work and investment commitment                        | No right to start mining                                                                |
| Rwandan staff                   | Art 13, Annex III                                             | At least 70% of non-manual staff and contractors Rwandan; training within 3 years; manual and unskilled posts Rwandan only; annual report | Material breach; termination after 30 days' cure notice                                 |
| Local contractors and materials | Art 72 Mining Law; Art 14, Annex III                          | Preference where competitive; Rwandan goods within 10% of foreign price; report within 30 days of year end                                | Material breach; licence conditions                                                     |
| Community plan                  | Art 74 Mining Law; Art 17, Annex III                          | Plan agreed with the District and submitted to RMB; optional implementation agreement                                                     | Breach of licence and agreement                                                         |
| ESIA                            | Art 38 Mining Law; MO N° 003/ MoE/25                          | Approved assessment and RDB certificate before operations                                                                                 | No right to operate; fines under Art 62                                                 |
| Rehabilitation guarantee        | Art 41 Mining Law; Reg. 001/ MINES/RMB/ 2019                  | Equal to EMP liabilities; 10% non-refundable, 90% refundable; deposited with the National Fund for Environment                            | Termination ground (Art 25.3, Annex III)                                                |
| Rehabilitation                  | Arts 39, 40, 55 and 60 Mining Law                             | Rehabilitate to the plan; liable until REMA's final certificate                                                                           | RWF 5,000,000 to 10,000,000 (mining); RWF 3,000,000 to 5,000,000 (quarry); restitution  |

| Obligation | Source                        | What it requires                                                   | Consequence of breach                                                         |
|------------|-------------------------------|--------------------------------------------------------------------|-------------------------------------------------------------------------------|
| Explosives | Arts 43, 61 and 70 Mining Law | Prior authorisation of the Minister in charge of internal security | RWF 5,000,000 to 10,000,000; or 5 to 7 years and RWF 40,000,000 to 75,000,000 |

## From licence grant to first production

### 1 Receive the licence and the draft agreement

After grant, RMB tables the model agreement for the licence category (Annex III for large-scale, IV for medium-scale, V for small-scale). Compare it clause by clause with the commitments in your application file, which become its annexes.

### 2 Finalise the four plans

Agree with RMB the Minimum Work and Investment Commitment, the employment and skills transfer plan, the procurement plan for local goods and services and value addition, and the community development plan, which must first be agreed with the District under Article 74.

### 3 Obtain the ESIA certificate

Apply online through the RDB One Stop Centre under Ministerial Order N° 003/MoE/25, host RDB's site visit, commission the study from licensed experts and sign the conditions of approval; submit the approved report to RMB (Article 38).

### 4 Fund the rehabilitation guarantee

Fix the rehabilitation budget from the environmental management plan, pay 10% in cash and provide the 90% balance in cash or as a bank guarantee to the National Fund for Environment, and annex the proof to the agreement.

### 5 Settle with landowners and occupiers

Pay fair compensation before operations and arrange registration of the land to the State (Article 4), or resettle occupiers, and keep signed records; this is a condition precedent to mining.

### 6 Secure explosives and safety approvals

Apply through RMB for a blasting recommendation and to the Minister in charge of internal security for authorisation; insure employees and issue protective equipment before work starts (Articles 43 and 52).

### 7 Sign the agreement and start within 180 days

Sign with RMB, start mining within 180 days of the licence, and diarise the recurring dates: monthly royalties, 31 December fees and rent, the 30-day procurement report and the annual employment report.

## Negotiating the RMB agreement

Points an investor or lender should raise before signing. The model is RMB's standard text; most of these are requests, not entitlements.

### ☐ Version and legal basis

Confirm in writing which model RMB is using and how it will apply once regulations under Article 73 replace Regulations 004/MINES/RMB/2019.

### ☐ Review clause

Consider defining 'critical matter' to cover specific events, such as a change in royalty rates or export rules, since there is no stabilisation clause.

### ☐ Cure periods

Check that the 30-day remedy and 30-day termination notices in Article 25.4 apply to every termination ground, and seek longer periods for complex breaches.

### ☐ Assets on termination

Seek RMB's agreement that financed plant will not revert without compensation, or a lender step-in right, given Article 26.

### ☐ Local content baselines

Record in the employment plan the positions for which no Rwandan is yet qualified and the 3-year training route for each, so that the 70% rule is measured fairly.

### ☐ Community plan scope

Fix the community commitments in money and time, align them with the District development plan, and decide whether to sign an implementation agreement with the District.

### ☐ Guarantee form

Agree the rehabilitation budget method and the bank guarantee wording early, because the National Fund for Environment must hold it before operations start.

### ☐ Dispute clause

Check the KIAC clause against any investment treaty rights and the financing documents, and consider the number of arbitrators and the language.

## WORKED EXAMPLE

### A tungsten mine's rehabilitation guarantee and local content tests

A Rwandan subsidiary of an Australian group holds a large-scale mining licence for a tungsten deposit. Its environmental management plan shows rehabilitation liabilities of RWF 900,000,000. All figures are illustrative.

#### Rehabilitation guarantee

Equal to the plan liabilities: RWF 900,000,000 (Article 4 of Regulations 001/MINES/RMB/2019).

|                                    |                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Non-refundable part</b>         | 10% x RWF 900,000,000 = RWF 90,000,000, paid in cash to the National Fund for Environment.                                                                                                                                                                                                                                           |
| <b>Refundable part</b>             | 90% x RWF 900,000,000 = RWF 810,000,000, provided as a bank guarantee before operations start.                                                                                                                                                                                                                                       |
| <b>Staffing test</b>               | Non-manual employees and contractors: 160. At least 70% must be Rwandan: $0.7 \times 160 = 112$ . The company has 104 Rwandans and shows RMB that 8 specialist posts cannot yet be filled locally; it must train a Rwandan for each within 3 years.                                                                                  |
| <b>Manual workforce</b>            | All 240 manual and unskilled workers must be Rwandan; no exception is available.                                                                                                                                                                                                                                                     |
| <b>Procurement test</b>            | A Rwandan fabricator quotes RWF 107,000,000 for a crusher frame against an imported RWF 100,000,000. $10\% \times \text{RWF } 100,000,000 = \text{RWF } 10,000,000$ , so RWF 107,000,000 is within the margin and, if the standard is met, the Rwandan supplier must be preferred. A quote of RWF 112,000,000 would fall outside it. |
| <b>Assets on early termination</b> | Mobile fleet with net depreciated book value of RWF 400,000,000 and market value of RWF 520,000,000: the Government may buy it within 30 days for RWF 400,000,000, the lower figure (Article 26).                                                                                                                                    |
| <b>Refund at closure</b>           | Three years after REMA's completion certificate, with a certificate of non-outstanding liabilities, the company may claim back the RWF 810,000,000 refundable part; the RWF 90,000,000 is never returned.                                                                                                                            |

Had the company failed to rehabilitate, it would also face an administrative fine of up to RWF 10,000,000 and an order to make restitution (Article 55).

The figures in the model agreement are commitments RMB monitors through annual reports; shortfalls are a termination ground after a 30-day cure notice.

## Questions investors ask

### Does a mining company sign a contract with the Rwandan Government?

Yes, for industrial mining and quarry licences. Article 73 of Law N° 072/2024 requires RMB to enter into an agreement with the licence holder to perfect its rights and obligations. Pending new regulations, RMB uses the model agreements annexed to Regulations 004/MINES/RMB/2019, which cover work commitments, local content, community development, rehabilitation, transfers, termination and KIAC arbitration.

### Are there local content requirements for mining in Rwanda?

Yes. Article 72 of the Mining Law requires preference for Rwandan contractors and Rwandan-made materials where competitive. The 2019 model agreement adds that at least 70% of non-manual staff and contractors must be Rwandan, that manual and unskilled posts are reserved to Rwandans, and that Rwandan goods priced within 10% of a foreign offer must be preferred.

### **How are disputes under a Rwandan mining agreement resolved?**

Under the model agreement the parties first try to settle amicably for 30 days. Unresolved disputes go to arbitration under the KIAC Rules, seated in Kigali, before one or three arbitrators, in Kinyarwanda, English or French, and the award is final and binding. The agreement is governed by Rwandan law.

### **How much is the rehabilitation guarantee for a mine in Rwanda?**

It equals the licence holder's liabilities under its environmental management plan. Under Regulations 001/MINES/RMB/2019 it may be cash or a bank guarantee, 10% is non-refundable and 90% refundable, and it is deposited with the National Fund for Environment before operations start. The refund requires a certificate of non-outstanding liabilities, available three years after the completion certificate.

### **Must a mining company fund community projects?**

It must prepare a plan for development and social welfare with the District where it operates and submit the agreed plan to RMB (Article 74 of Law N° 072/2024). No minimum spend is set by law; the content is negotiated, must be consistent with the District's development plan, and may be implemented through an agreement with the District.

### **Who authorises explosives at a Rwandan mine?**

The Minister in charge of internal security, on RMB's recommendation (Article 43 of Law N° 072/2024). Expired dynamites may not be used. Unauthorised transfer or use of expired dynamites costs RWF 5,000,000 to RWF 10,000,000, and handling them without a permit is an offence punishable by 5 to 7 years' imprisonment.

#### **THE 2027 HORIZON**

- RMB regulations under Article 73 (content of the agreement), Article 41 (rehabilitation guarantee), Article 47 (service fees) and Article 71 (services by private operators) of Law N° 072/2024 had not been published by 10 October 2026; when they appear they will replace the 2019 Regulations and may change the model agreement, the guarantee and the fees.
- The Order of the Minister in charge of Government investment on free carried interest under Article 49, and the internal security Minister's Order on dynamites under Article 43(3), are both still awaited.
- Application of Ministerial Order N° 003/MoE/25 of 19/08/2025 to mining projects, as RDB issues the first certificates under its expanded social, resettlement and grievance content.
- Implementation of the Regional Economic Integration Framework signed with the Democratic Republic of the Congo on 4 December 2025, whose commitments on formalising artisanal and small-scale mining and on joint traceability may lead to new rules for cooperatives and buyers.
- The Cabinet's appointment on 4 March 2026 of RMB senior managers, including a Division Manager for Mining Cadastre and Digital Information, and RMB's listed MCIS upgrade and digital traceability projects may bring online filing of the annual employment, procurement and community reports.

## Terms you will meet in the documents

| English                                 | Kinyarwanda                                               | French                                                   | Meaning                                                                                                                                                     |
|-----------------------------------------|-----------------------------------------------------------|----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Agreement with the licence holder       | <i>amasezerano n'umuntu wahawe uruhushya</i>              | <i>contrat avec le titulaire de permis</i>               | The agreement RMB signs with an industrial mining or quarry licence holder to perfect its rights and obligations (Article 73 of Law N° 072/2024).           |
| Procurement of local goods and services | <i>amasoko y'ibikoresho n'imirimo iboneka mu Gihugu</i>   | <i>passation de marchés des biens et services locaux</i> | The duty to prefer competitive Rwandan contractors and materials and to report on compliance (Article 72).                                                  |
| Plan for development and social welfare | <i>gahunda y'iterambere n'imibereho myiza y'abaturage</i> | <i>plan de développement et de progrès social</i>        | The community plan prepared with the District and submitted to RMB (Article 74).                                                                            |
| Rehabilitation plan                     | <i>gahunda y'isubiranya</i>                               | <i>plan de réhabilitation</i>                            | The plan of rehabilitation activities and budget every exploration, mining or quarry licence holder must have (Article 40).                                 |
| Rehabilitation guarantee                | <i>ingwate yo gusubiranya</i>                             | <i>caution de réhabilitation</i>                         | Security for rehabilitation, 10% non-refundable and 90% refundable, held by the National Fund for Environment (Article 41; Regulations 001/MINES/RMB/2019). |
| Environmental impact assessment         | —                                                         | <i>étude d'impact environnemental</i>                    | The study on which rehabilitation and the environmental management plan are based; the approved report is required before operations (Articles 38 and 39).  |
| Government investment                   | <i>ishoramari rya Leta</i>                                | <i>investissement de l'État</i>                          | Shares the Government may acquire in a mining or quarry operation on agreed terms (Article 48).                                                             |
| Dynamites                               | <i>intambi</i>                                            | —                                                        | Explosives whose import, transport, trade and use in mining need the prior authorisation of the Minister in charge of internal security (Article 43).       |

## FOREIGN V RWANDAN INVESTOR

Most obligations in this section apply in the same way to every licence holder: the agreement, the community plan, the ESIA, the guarantee, the safety and explosives rules and the criminal provisions do not depend on the owner's nationality. The differences lie in who may hold which licence and in who must be employed. Under Regulations 005/MINES/RMB/2019, still applied by RMB, a small-scale mine must be owned by Rwandan nationals and a medium-scale mine must have at least 40% local shareholders, while exploration and large-scale licences carry no such rule; licences are granted to companies registered in Rwanda, so a foreign group operates through a Rwandan subsidiary (Mining licences and quarry licences).

The local content rules protect Rwandan workers and suppliers rather than Rwandan owners, so a Rwandan-owned licensee is bound by the 70% staffing and 10% procurement rules just as a foreign-owned one is; in practice the burden falls on projects that rely on expatriate specialists and imported equipment. The texts speak of 'Rwandans' and 'Rwandan nationals' and contain no exception for East African Community (EAC) or COMESA nationals, so a Kenyan or Ugandan engineer counts as non-Rwandan for the 70% test even though EAC nationals benefit elsewhere from easier work permit rules. A foreign investor may also hold investment treaty protection that complements the KIAC clause in the agreement; a Rwandan investor relies on the agreement and the Rwandan courts.

## WATCH OUT FOR

- Treating the 2019 model agreement as statute: it is RMB's standard text, applied in practice, and will be replaced when regulations under Article 73 are issued.
- Financing fixed plant without RMB's consent to the security and a step-in right: on termination fixtures pass to the Government without compensation unless RMB decides otherwise.
- Counting EAC nationals as Rwandans for the 70% staffing test, or engaging any non-Rwandan in a manual or unskilled post.
- Starting operations before the ESIA certificate, the guarantee deposit and landowner compensation are in place: each is a condition of lawful operation.
- Buying minerals from small-scale producers without licence and origin checks: possession of illegally extracted minerals is an offence and minerals without proof of origin are confiscated.
- Assuming the Mining Law gives a 30-day cure period before cancellation: that period comes from the model agreement, and Article 53 of the Law contains none.

---

## OFFICIAL SOURCES

- Rwanda Mines, Petroleum and Gas Board: Law N° 072/2024 of 26/06/2024 on mining and quarry operations, Official Gazette n° Special of 24/07/2024, Articles 38 to 43, 55, 61, 70 and 72 to 75 — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Laws/Law\\_n\\_\\_0722024of\\_26062024\\_on\\_mining\\_and\\_quarry\\_operations.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Laws/Law_n__0722024of_26062024_on_mining_and_quarry_operations.pdf)
- Rwanda Mines, Petroleum and Gas Board: Regulations of the CEO N° 004/MINES/RMB/2019 of 18/07/2019 (format of mineral licences and model agreements), Official Gazette n° 29 bis of 29/07/2019 — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Regulations/Regulations\\_of\\_the\\_CEO\\_No\\_004.MINES.RMB.2019\\_of\\_18.07.2019\\_determining\\_the\\_format\\_and\\_content\\_of\\_a\\_mineral\\_license\\_and\\_the\\_content\\_of\\_an\\_agreement\\_with\\_a\\_minin\\_g\\_or\\_industrial\\_quarry\\_license\\_holder.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Regulations/Regulations_of_the_CEO_No_004.MINES.RMB.2019_of_18.07.2019_determining_the_format_and_content_of_a_mineral_license_and_the_content_of_an_agreement_with_a_minin_g_or_industrial_quarry_license_holder.pdf)
- Rwanda Mines, Petroleum and Gas Board: Regulations of the CEO N° 001/MINES/RMB/2019 of 18/07/2019 determining the nature, amount and deposit of environmental rehabilitation guarantee — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Regulations/Regulations\\_of\\_the\\_CEO\\_No\\_001.MINES.RMB.2019\\_of\\_18.07.2019\\_determining\\_the\\_nature\\_\\_amount\\_and\\_deposit\\_of\\_environmental\\_rehabilitation\\_guarantee.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Regulations/Regulations_of_the_CEO_No_001.MINES.RMB.2019_of_18.07.2019_determining_the_nature__amount_and_deposit_of_environmental_rehabilitation_guarantee.pdf)
- Rwanda Development Board: business procedures portal, ESIA certificate steps citing Ministerial Order N° 003/MoE/25 of 19/08/2025 (shown within the special economic zone user licence procedure) — <https://businessprocedures.rdb.rw/procedure/print/188/step/0?showRecourses=true&showCertification=false&l=en&embed=true&includeSearch=false>
- Rwanda Mines, Petroleum and Gas Board: Guidelines and standards (mining licence application form, Mining Safety Standards) — <https://www.rmb.gov.rw/publications/guidelines>

## Strategic minerals and regional deals: the unused power to designate strategic minerals under Article 3(d) of Law N° 072/2024, State equity and free carried interest, lithium, tungsten and rare-earth targets, RMB's 2025 investment rounds, the Rwanda-DRC Regional Economic Integration Framework of 4 December 2025, the US-Rwanda economic framework and what each means for an investor

Reviewed 10 October 2026 · Prepared by a commercial lawyer with over 30 years' international experience · Legal and tax information, not legal advice · [How we check](#) · [Open in the app](#)

## WHAT YOU NEED TO KNOW

- Article 3(d) of Law N° 072/2024 of 26/06/2024 on mining and quarry operations allows the Rwanda Mines, Petroleum and Gas Board (RMB) to designate strategic minerals over which the Government exercises exclusive rights in the public interest, but no designation had been published by 10 October 2026.
- Article 48 of Law N° 072/2024 allows the Government to acquire shares in mining or quarry operations on terms agreed with the licence holder, and Article 49 provides that a mining licence may entitle the Government to free carried interest whose number and modalities are to be set by an Order of the Minister in charge of Government investment, which had not been published by 10 October 2026.
- RMB's Mining Investment Pitchbook offered 10 blocks in May 2025, with a deadline of 16 August 2025 and 73 applications received, and a further 10 blocks (4 mining, 4 exploration and 2 gemstone) on 3 December 2025 with a deadline of 3 March 2026, with tin, tantalum, tungsten, gold, lithium, beryllium and gemstones among the target minerals and, for the December round, results due within 90 days of the deadline.
- The Regional Economic Integration Framework signed in Washington on 4 December 2025 by the Foreign Ministers of the Democratic Republic of the Congo and Rwanda states that each country has full, sovereign control over its natural resources, commits the two States to remove barriers to the direct and lawful export of tin, tantalum, tungsten, niobium and gold, to endeavour to harmonise royalties and other levies, to route minerals payments through or document them by formal financial institutions, and takes effect only once the Joint Oversight Committee determines that the security arrangements under the 27 June 2025 Peace Agreement have been satisfactorily executed.
- The Framework Between the United States and Rwanda for Shared Economic Prosperity, signed on 4 December 2025, is an economic framework covering mining, mineral processing and energy rather than a minerals treaty, and its text had not been published in the sources reviewed; investment protection between the two countries rests on the United States-Rwanda bilateral investment treaty in force since 1 January 2012.
- No law bans the export of unprocessed minerals: the policy tools are the additional export tax on minerals exported in raw form under Article 5 of Law N° 056/2024 of 26/06/2024 establishing tax on minerals (for example 2% of norm value for base metals and 0.5% for gold) and the exclusion of exporters of unprocessed minerals from the Investment Code's 15% exporter rate.

## What 'strategic' means in Rwandan mining law

Rwandan law uses the word in one place. Article 3(d) of **Law N° 072/2024 of 26/06/2024 on mining and quarry operations** (the Mining Law) allows the competent organ, the **Rwanda Mines, Petroleum and Gas Board (RMB)**, to 'designate certain strategic minerals for which the Government exercises exclusive rights in the public interest'; Article 3(e) gives a parallel power over quarries reserved for Government projects. The Law sets no procedure, criteria or compensation rule for a designation, and none had been made or published by 10 October 2026. The power nonetheless matters: a designation could reserve a mineral to the State after an investor has spent money exploring for it, and an exploration licence gives a 'primary right' to a mining licence only within the existing legal framework. Investors exploring for

lithium, rare earths or other minerals with strategic value elsewhere should ask RMB in writing whether a designation is under consideration and seek protection in the agreement with RMB, discussed in Mining agreements, local content and community.

Outside the Mining Law, 'critical' and 'strategic' are policy labels. In its announcement of 2 December 2025 RMB described tin, tantalum, tungsten, lithium, beryllium, rare earth elements and gold as Rwanda's 'strategic minerals', a policy description rather than a designation under Article 3(d). No national critical-minerals strategy had been adopted by 10 October 2026, and commentators in Kigali called for one in December 2025. The practical consequence is that a mineral's strategic status changes the commercial and political context of a project, the buyers it attracts and the sanctions and due-diligence scrutiny it receives, but not, so far, the licence regime that applies to it.

## State equity and free carried interest

Two provisions allow the State into a project. Article 48 provides that the Government may acquire shares in mining or quarry operations 'on such terms as agreed upon between the holder of a licence and the Government'; Article 15 of RMB's 2019 large-scale model agreement repeats the point. This is a negotiated stake, which the Government may pay for in cash or in kind. Article 49 goes further: the grant of a mining licence 'may entitle the government with free carried interest', and an Order of the Minister in charge of Government investment is to determine 'the number and modalities' of that interest. That Order had not been published by 10 October 2026, so no carried interest can yet be imposed by reference to it, but the statutory basis exists and a mining licence granted now could become subject to it once the Order is made.

Some secondary sources state that Rwanda takes no carried interest; that reflects current practice rather than the Law. Investors should model both cases: a negotiated equity stake under Article 48, which is the route used in recent ventures, and a possible free carried interest under Article 49, whose size is unknown. The September 2026 tungsten venture between Almonty Industries and the Government of Rwanda illustrates the first route: according to Almonty's announcement of 14 September 2026, filed with the United States Securities and Exchange Commission, Almonty holds 75% and the Government 25%, the Government contributing the Shyorongi exploration concession of about 32 km<sup>2</sup> and a licence to process tailings with mobile plant. Anyone acquiring an existing licence should check whether any State equity, option or carried interest has been promised, because a transfer needs RMB's prior approval under Articles 16 to 18 of the Mining Law.

## Where the opportunities are: the 2025 investment rounds

RMB moved to competitive allocation in 2025 through its **Rwanda Mining Investment Pitchbook**. The first round, launched in May 2025, offered 10 blocks with a closing date of 16 August 2025 and drew 73 applications. The second, announced on 3 December 2025 during Rwanda Mining Week, offered another 10 blocks, 4 for mining, 4 for exploration and 2 for gemstones, with a closing date of 3 March 2026; RMB's instructions for that round state that applicants would be informed of the results within 90 days after the closing date. The December blocks cover lithium and beryllium as well as the traditional tin, tantalum, niobium, tungsten and gold and gemstones such as sapphire, ruby, amethyst and tourmaline, and the May 2025 pitchbook describes one block's surroundings as possibly hosting a rare

earth element deposit. Applications follow the 2019 RMB regulations on applications and tenders, which RMB continues to apply, and require the full licence file described in [Mining licences and quarry licences](#).

Exploration is at an early stage. RMB reports 52 target areas under exploration and more than 92,000 jobs in the sector, and the Rwanda Development Board (RDB) reports mineral exports of USD 1.1 billion in 2023, against USD 373.4 million in 2017. Lithium has attracted most attention: in July 2025 the press reported drilling results of 7 metres at 2.1% lithium from a project of Aterian with Rio Tinto, and secondary sources refer to a planned lithium refinery. These are company and press reports, not RMB findings. On processing, RMB stated on 2 December 2025 that refining of gold, tin and tantalum is already operational in Rwanda, and tungsten processing is the object of the Almonty venture.

## Raw exports: taxed, not banned

Rwanda does not prohibit the export of unprocessed minerals. Its tools are fiscal. Under **Law N° 056/2024 of 26/06/2024 establishing tax on minerals**, in force since 5 July 2024, minerals 'exported in raw form' pay an **export tax** on top of the mining royalty tax: 2% of norm value for base metals (including tin, tungsten, tantalum and niobium), 3% for gemstones, 2% for platinum group metals, 1% for rare-earth elements, 2% for energy minerals such as lithium and cobalt, and 0.5% for gold (Article 5). Processed minerals and imported minerals for re-export, except gold, are exempt from tax on minerals at the export point (Article 7(2)), and neither tax is deductible for income tax (Article 6(3)). Separately, the Investment Code's 15% corporate income tax rate for exporters does not apply to exporters of unprocessed minerals, while 'processing and value addition in mining' is a priority activity. The rates and the collection rules are explained in [Mineral tax, royalties and fiscal terms](#).

RDB's investment pages state that trading in minerals, 'including cassiterite, wolframite and niobium - tantalite, must contain at least 30% value added'. No legal instrument imposing that requirement was found: it does not appear in the Mining Law, in Law N° 056/2024 or in RMB's 2019 regulations on processing and trading licences. It should be treated as a policy statement until RMB confirms its legal basis, and any buyer or trader relying on a contrary position should obtain that confirmation in writing.

## The Washington process and the Regional Economic Integration Framework

The Democratic Republic of the Congo (DRC) and Rwanda signed a Declaration of Principles on 25 April 2025 and a Peace Agreement on 27 June 2025, both with United States facilitation. Economic integration was negotiated in parallel: the **Regional Economic Integration Framework (REIF)** was agreed in November 2025 and signed at Washington on 4 December 2025 by the two Foreign Ministers, as part of the Washington Accords for Peace and Prosperity. The text released by the United States Department of State begins from the principle that 'each country has full, sovereign control over the exploitation, processing, and export of its natural resources' and that initiatives must comply with each country's laws.

On minerals the REIF commits the two governments to combat and progressively eliminate illicit extraction and trade; to 'progressively eliminate barriers' obstructing the direct and lawful export of minerals sourced in the region, notably tin, tantalum, tungsten, niobium and gold; to block the financing

networks of armed groups; to formalise artisanal and small-scale mining, including through cooperatives and joint traceability; to build regional value chains with processing plants in both countries and value sharing through 'equity participation, royalties and revenue-sharing mechanisms'; to locate tolling centres in both countries, with unpaid tax and duty remitted automatically to the relevant jurisdiction; to endeavour to 'harmonize tax policies -including royalties, levies, and any other form of taxation or fees' and avoid harmful tax competition; to develop end-to-end digital traceability and publish mine, licensing and trade data; to mandate that minerals-related transactions occur through, or are documented by, formal financial institutions; and to explore joint cross-border special economic zones. On energy it prioritises financial close of the Ruzizi III hydropower project and the cooperative exploitation of Lake Kivu methane ([Petroleum and Lake Kivu methane](#)). On investment the parties commit to ratifying the Rwanda-DRC bilateral investment treaty.

Three features limit its legal effect. Its implementation measures are stated to be 'instructive and not prescriptive' and adjustable through its coordination mechanisms. It takes effect only 'upon satisfactory execution' of the Concept of Operations annexed to the Peace Agreement and of the related operation order, as determined by the Joint Oversight Committee; whether that determination had been made by 10 October 2026 could not be confirmed. And it changes no Rwandan law: harmonised royalties, tolling arrangements or payment rules would need Rwandan legislation or regulations. Its governance bodies are a Steering Committee due to meet within 30 days of signature, technical working groups due within 45 days, an annual high-level summit, the first within six months, and a Private Sector Input Mechanism through which investors may be consulted.

## The United States-Rwanda framework and commercial deals

On the same day Rwanda and the United States signed a **Framework Between the United States and Rwanda for Shared Economic Prosperity**, reported to cover mining and mineral processing and energy. It is an economic framework, not a minerals treaty: its text had not been published in the sources reviewed, and in June 2026 the chairman of Trinity Metals was still publicly proposing a separate minerals strategic partnership agreement, which suggests none exists. Legally enforceable protection for United States investors continues to come from the United States-Rwanda bilateral investment treaty, in force since 1 January 2012, explained in [Investment guarantees, treaties and reporting](#).

Commercial activity has followed. In May 2025 Trinity Metals signed a letter of intent with the United States tin trader Nathan Trotter; the press reported in June 2026 that more than 320 tonnes of tungsten concentrate had been shipped to Pennsylvania since August 2025; and Almonty described its September 2026 venture with the Government as 'aligned with' the United States framework. These are company and press statements and should be checked in each transaction.

## Headwinds: sanctions and European scrutiny

The same period brought measures that a buyer, lender or partner must take into account. On 17 March 2025 the Council of the European Union listed Gasabo Gold Refinery, a Kigali refinery, and the then chief executive of RMB under its Democratic Republic of the Congo sanctions regime. On 2 March 2026 the United States Department of the Treasury designated the Rwanda Defence Force and four of its senior officers under Executive Order 13413, as amended, citing actions it said threatened the peace, security or stability of the DRC and material assistance to the M23 group. On 25 June 2026 the Treasury

designated Gasabo Gold Refinery LTD, its chairman, its general manager and three Rwandan mining companies. The scope of these measures, what they require of buyers and how to screen counterparties are set out in [Sanctions, due diligence and reforms](#).

Within Europe, the European Union and Rwanda signed a memorandum of understanding on sustainable raw materials value chains on 19 February 2024; members of the European Parliament asked in February 2025 for it to be suspended, and its status at 10 October 2026 could not be confirmed. Importers into the European Union of tin, tantalum, tungsten and gold remain subject to Regulation (EU) 2017/821, for whose review the European Commission published a prior information notice on 11 May 2026 and a call for tenders on 16 June 2026.

### The regional and bilateral instruments at a glance

| Instrument                               | Date                                         | Parties                       | Legal character                                                              | What it means for an investor                                                                         |
|------------------------------------------|----------------------------------------------|-------------------------------|------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
| Declaration of Principles                | 25 April 2025                                | DRC, Rwanda (US facilitation) | Political declaration                                                        | Background to the Peace Agreement and the REIF                                                        |
| Peace Agreement                          | 27 June 2025                                 | DRC, Rwanda                   | Agreement between States; security arrangements in its Concept of Operations | Its execution, as judged by the Joint Oversight Committee, triggers the REIF                          |
| Regional Economic Integration Framework  | Agreed November 2025; signed 4 December 2025 | DRC, Rwanda                   | Framework; measures 'instructive and not prescriptive'; conditional effect   | Signals harmonised royalties, tolling, traceability and formal payments; no change to Rwandan law yet |
| Framework for Shared Economic Prosperity | 4 December 2025                              | United States, Rwanda         | Economic framework; text not published                                       | Political support for US-linked mining, processing and energy projects                                |
| US-Rwanda bilateral investment treaty    | In force 1 January 2012                      | United States, Rwanda         | Treaty                                                                       | Enforceable protection and investor-State arbitration for qualifying US investors                     |
| Rwanda-DRC bilateral investment treaty   | Signed; ratification committed in the REIF   | DRC, Rwanda                   | Treaty not yet in force                                                      | No protection until ratified                                                                          |
| EU-Rwanda memorandum on raw materials    | 19 February 2024                             | European Union, Rwanda        | Memorandum of understanding                                                  | Status after 2025 suspension requests unconfirmed                                                     |

## DECISION GUIDE

### Does a regional or bilateral deal change my project's legal position?

A decision guide for an investor assessing a Rwandan mineral project in the light of the 2025 agreements. It describes the position at 10 October 2026.

#### Q1 Is your mineral one that RMB has designated as strategic under Article 3(d)?

**Yes** Government exclusive rights apply; private licences may not be available. None had been designated at 10 October 2026.

**No** The ordinary licence regime applies; continue to Q2.

#### Q2 Does your project depend on a REIF commitment, such as direct export of DRC-sourced minerals, tolling or harmonised royalties?

**Yes** Treat it as a policy direction only: the REIF changes no Rwandan law and takes effect only on the Joint Oversight Committee's determination. Build the economics on current law; continue to Q3.

**No** Continue to Q3.

#### Q3 Are you a United States investor relying on the 4 December 2025 US-Rwanda framework?

**Yes** Rely for legal protection on the 2012 bilateral investment treaty and on your agreement with RMB; the framework itself is not an enforceable instrument in the sources reviewed. Continue to Q4.

**No** Check whether your home State has an investment treaty in force with Rwanda; continue to Q4.

#### Q4 Will the Government take equity or a carried interest?

**Yes** Negotiate the terms under Article 48 now and seek a contractual position on any future Article 49 Order; continue to Q5.

**No** Model a possible Article 49 carried interest as a downside case; continue to Q5.

#### Q5 Will any supplier, buyer, refiner or partner be a sanctioned person or owned 50% or more by one?

**Yes** Stop and take sanctions advice before proceeding; see the next section of this chapter.

**No** Proceed with documented screening and OECD-based due diligence.

## WORKED EXAMPLE

### Raw concentrate or processed metal: a tungsten venture's tax position

A joint venture held 75% by a foreign mining group and 25% by the Government, on the pattern of the 2026 tungsten venture, sells tungsten production with a norm value of RWF 20,000,000,000 in a year. All figures are illustrative; the norm value is fixed by RMB and the rates are those of Law N° 056/2024.

|                                              |                                                                                                                                                                                                                                       |
|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Option A: export raw concentrate</b>      | Mining royalty tax 3% x RWF 20,000,000,000 = RWF 600,000,000; export tax on raw base metal 2% x RWF 20,000,000,000 = RWF 400,000,000; total RWF 1,000,000,000, paid by the venture as miner-exporter (Article 6(2)).                  |
| <b>Option B: sell to a Rwandan processor</b> | Royalty RWF 600,000,000 withheld by the processor at purchase and remitted within 15 days after the month; no raw export tax; the processed product is exempt from tax on minerals at export (Article 7(2)). Saving: RWF 400,000,000. |
| <b>Income tax effect</b>                     | Neither tax is deductible (Article 6(3)). On illustrative taxable profit of RWF 6,000,000,000, corporate income tax at 28% is RWF 1,680,000,000 in both options; the 15% exporter rate is not available in Option A.                  |
| <b>Profit after tax (Option B)</b>           | RWF 6,000,000,000 - RWF 1,680,000,000 = RWF 4,320,000,000 distributable.                                                                                                                                                              |
| <b>Dividends</b>                             | Government 25% = RWF 1,080,000,000. Foreign group 75% = RWF 3,240,000,000, less 15% withholding tax of RWF 486,000,000 unless a treaty reduces it: net RWF 2,754,000,000.                                                             |
| <b>If an Article 49 Order applied</b>        | A free carried interest would dilute the foreign group further; its size cannot be modelled until the Order is published.                                                                                                             |

The figures show why value addition is the policy lever: the RWF 400,000,000 export tax is a cost of exporting raw, not a ban.

Taxable profit is assumed to be the same in both options for simplicity; in practice the processing margin and transport costs differ.

## Questions investors ask

### Has Rwanda designated any strategic minerals?

No designation had been published by 10 October 2026. Article 3(d) of Law N° 072/2024 allows RMB to designate strategic minerals over which the Government exercises exclusive rights in the public interest, but the Law sets no procedure or criteria. Investors exploring for lithium, rare earths or similar minerals should ask RMB whether a designation is being considered.

### **Does the Rwandan Government take a free stake in mining projects?**

Not automatically at present. Article 49 of the Mining Law allows a mining licence to entitle the Government to free carried interest, but the Ministerial Order fixing its size and modalities had not been published by 10 October 2026. Article 48 separately allows the Government to buy or negotiate shares, as in the 2026 Almonty tungsten venture with a 25% Government stake.

### **Does the Rwanda-DRC economic framework allow DRC minerals to be exported through Rwanda?**

The REIF commits both States to remove barriers to the direct and lawful export of regionally sourced tin, tantalum, tungsten, niobium and gold and to build regional value chains with tolling centres in both countries. Its measures are instructive, not prescriptive, it depends on security conditions being met, and it changes no Rwandan law by itself.

### **Is there a minerals agreement between the United States and Rwanda?**

Rwanda and the United States signed a Framework for Shared Economic Prosperity on 4 December 2025 covering mining, mineral processing and energy, but it is an economic framework and its text had not been published in the sources reviewed. Enforceable protection for US investors comes from the bilateral investment treaty in force since 1 January 2012.

### **Can unprocessed minerals be exported from Rwanda?**

Yes. No law bans raw exports. Under Law N° 056/2024 raw exports pay an export tax on top of the royalty, for example 2% of norm value for base metals and 0.5% for gold, and exporters of unprocessed minerals cannot use the Investment Code's 15% exporter rate. RDB's statement that 3T trade must include 30% value added has no identified legal basis.

### **How can I apply for a mineral block in Rwanda?**

RMB allocates selected blocks through competitive rounds published in its Mining Investment Pitchbook; the second 2025 round closed on 3 March 2026 with results due within 90 days. Outside a round, an investor checks availability on RMB's online cadastre and applies for a licence through the One Stop Center with the full technical, financial and community file.

## THE 2027 HORIZON

- The Ministerial Order on free carried interest under Article 49 of Law N° 072/2024, and any designation of strategic minerals under Article 3(d); neither had been published at 10 October 2026.
- The Joint Oversight Committee's determination that triggers the REIF, its Steering Committee and working groups, and any Rwandan legislation to harmonise royalties or regulate tolling centres.
- Ratification of the Rwanda-DRC bilateral investment treaty, to which both States committed in the REIF.
- A national critical-minerals strategy, called for in December 2025, and RMB's December 2025 call for mining-specific investment incentives.
- Further RMB pitchbook rounds and the outcome of the 3 March 2026 round, and the progress of lithium and tungsten projects such as the Almonty venture.
- The European Commission's review of Regulation (EU) 2017/821, put out to tender in May and June 2026, and the future of the EU-Rwanda raw materials memorandum.

## Terms you will meet in the documents

| English                          | Kinyarwanda                             | French                          | Meaning                                                                                                                              |
|----------------------------------|-----------------------------------------|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| Strategic minerals               | —                                       | <i>minerais stratégiques</i>    | Minerals RMB may designate for exclusive Government rights in the public interest (Article 3(d) of Law N° 072/2024).                 |
| Government free carried interest | <i>imigabane ya Leta itishyurirwa</i>   | <i>intérêt passif de l'État</i> | A stake the Government may receive without paying, under an Order still to be made (Article 49).                                     |
| Government investment            | <i>ishoramari rya Leta</i>              | <i>investissement de l'État</i> | Shares the Government acquires in a mining operation on agreed terms (Article 48).                                                   |
| Tax on minerals                  | <i>umusoro ku mabuye y'agaciro</i>      | <i>impôt sur les minerais</i>   | The mining royalty tax and export tax under Law N° 056/2024, neither deductible for income tax.                                      |
| Mining royalty tax               | <i>umusoro w'ikirombe</i>               | <i>redevance minière</i>        | The tax on the value of minerals sold, from 0.5% (gold) to 3% (base and energy minerals) (Article 4 of Law N° 056/2024).             |
| Export tax                       | <i>umusoro ku byoherezwa mu mahanga</i> | <i>taxe à l'exportation</i>     | The additional tax on minerals exported in raw form (Article 5 of Law N° 056/2024).                                                  |
| Norm value                       | <i>agaciro nyakuri</i>                  | <i>valeur normative</i>         | The international market value of minerals at the date of sale, less RMB-approved processing costs, on which most rates are charged. |

| English                      | Kinyarwanda                                       | French | Meaning                                                                                                                      |
|------------------------------|---------------------------------------------------|--------|------------------------------------------------------------------------------------------------------------------------------|
| Mining and quarry operations | <i>ubucukuzi bw'amabuye y'agaciro na kariyeri</i> | —      | The activities governed by Law N° 072/2024, including exploration, mining, processing and trading of minerals and quarrying. |

## FOREIGN V RWANDAN INVESTOR

The State's powers in this section, designation of strategic minerals, negotiated equity and a possible free carried interest, apply to every licence holder whatever its nationality, and the raw-export tax is the same for a Rwandan and a foreign exporter. The differences come from outside the Mining Law. Only foreign investors can rely on investment treaties: a United States investor has the 2012 bilateral investment treaty; a Congolese investor has none until the Rwanda-DRC treaty is ratified; and an investor from the East African Community (EAC) or COMESA relies on regional instruments and Rwandan courts.

Investors from the United States, the European Union and allied markets also carry obligations a Rwandan investor without such links does not: sanctions compliance, the EU Conflict Minerals Regulation and United States conflict-minerals reporting reach them, and through them their Rwandan partners. That is why the regional deals, which seek to open Western markets to Rwandan-processed minerals, and the sanctions, which restrict dealings with particular Rwandan persons, must be read together.

## WATCH OUT FOR

- Treating the REIF or the US-Rwanda framework as law: neither changes Rwandan law, and the REIF's effect is conditional on a security determination.
- Ignoring Article 49: free carried interest has a statutory basis even though the Order has not yet been made.
- Relying on RDB's '30% value added' statement as a legal rule, or on its absence, without RMB's written confirmation.
- Assuming a mineral's strategic profile brings special incentives: none exists in law at 10 October 2026, though RMB has called for them.
- Partnering with any person designated by the EU or the United States, or a company 50% or more owned by one, without sanctions advice.
- Assuming protection under a Rwanda-DRC investment treaty: it is not yet in force.

---

## OFFICIAL SOURCES

- Rwanda Mines, Petroleum and Gas Board: Law N° 072/2024 of 26/06/2024 on mining and quarry operations, Articles 3, 48 and 49 — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Laws/Law\\_n\\_\\_0722024of\\_26062024\\_on\\_mining\\_and\\_quarry\\_operations.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Laws/Law_n__0722024of_26062024_on_mining_and_quarry_operations.pdf)
- Rwanda Mines, Petroleum and Gas Board: Law N° 056/2024 of 26/06/2024 establishing tax on minerals, Official Gazette n° Special of 05/07/2024, Articles 4 to 7 — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Laws/Law\\_no\\_0562024of\\_26062024\\_establishing\\_tax\\_on\\_minerals.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Laws/Law_no_0562024of_26062024_establishing_tax_on_minerals.pdf)
- Rwanda Mines, Petroleum and Gas Board: A breakdown of the 10 mineral blocks now available to investors (3 December 2025) — <https://www.rmb.gov.rw/news-detail/a-breakdown-of-the-10-mineral-blocks-now-available-to-investors-1>
- United States Department of State release: Regional Economic Integration Framework between the Democratic Republic of the Congo and Rwanda, signed 4 December 2025 (text as published by allAfrica) — <https://allafrica.com/stories/202512040547.html>
- Rwanda Development Board: Mining investment opportunities — <https://rdb.rw/investment-opportunities/mining/>
- US Department of the Treasury: Treasury Sanctions Rwanda Officials (press release sb0411, 2 March 2026) — <https://home.treasury.gov/news/press-releases/sb0411>

## Petroleum and Lake Kivu methane: Law N° 13/2016 on petroleum exploration and production, the licence-plus-agreement model, exploration and production terms, discovery and appraisal deadlines, flaring, pipelines and decommissioning, the Lake Kivu basin, methane-to-power projects and their legal basis, and downstream fuel trade under Law N° 85/2013 and RURA

Reviewed 10 October 2026 · Prepared by a commercial lawyer with over 30 years' international experience · Legal and tax information, not legal advice · [How we check](#) · [Open in the app](#)

## WHAT YOU NEED TO KNOW

- Under Article 3 of Law N° 13/2016 of 02/05/2016 governing petroleum exploration and production activities (Official Gazette n° 21 of 23/05/2016), all rights of ownership and control of petroleum are vested in the State, and no one may explore for or produce petroleum except under a licence and a petroleum agreement with the Government, which may be a concession, joint venture, production sharing, service contract or equity participation agreement (Article 42).
- The Minister in charge of petroleum answers an exploration licence application within 90 days, negotiates an agreement and grants the licence within 7 days of its signature; the licence lasts 3 years, may be renewed for up to 3 years on an application made within the 90 days before expiry, and that renewal may be renewed once for up to 2 years (Articles 6, 7, 9 and 10 of Law N° 13/2016).
- A discovery must be reported within 30 days, a notice of whether it is of commercial interest given within 90 days and an appraisal programme prepared within 2 years of that notice, and a production licence lasts 25 years and may be renewed once, on an application made 12 months before expiry, for a non-renewable 10 years (Articles 15 to 17, 24 and 25 of Law N° 13/2016).
- The Ministerial Orders that Law N° 13/2016 requires on applications, guarantees, the reference map, the format of petroleum agreements and administrative sanctions had not been published by 10 October 2026, and the Ministry of Infrastructure's Energy Policy of February 2025 states that upstream regulations are not yet developed.
- Lake Kivu methane, shared with the Democratic Republic of the Congo, has no dedicated statute: it falls within the upstream remit of the Rwanda Mines, Petroleum and Gas Board (RMB), the Rwanda Utilities Regulatory Authority (RURA) monitors technical and safety aspects under Law N° 09/2013 of 01/03/2013, and the two methane-to-power plants, KivuWatt and Shema Power Lake Kivu (56 MW net), total 82.4 MW, which the Ministry of Infrastructure's Energy Policy of February 2025 puts at 21.1% of Rwanda's installed generation capacity of 406.4 MW.
- Import, transport, storage and sale of petroleum products require licences under Law N° 85/2013 regulating petroleum and petroleum products trade in Rwanda (Official Gazette n° 46 of 18/11/2013), with minimum stocks for licensees (Article 31), Government strategic stocks (Article 32) and fines of RWF 2,000,000 to RWF 5,000,000, or RWF 5,000,000 to RWF 20,000,000 for adulteration, and RURA regulates the trade and sets pump prices every two months.

## Three regimes: upstream petroleum, methane and downstream trade

Hydrocarbons are outside the mining regime: Article 2 of Law N° 072/2024 of 26/06/2024 on mining and quarry operations excludes them from the definition of minerals. Three separate sets of rules apply instead. Upstream oil and gas exploration and production are governed by **Law N° 13/2016 of 02/05/2016 governing petroleum exploration and production activities**, published in the Official Gazette n° 21 of 23/05/2016 and in force on publication (Article 47), which gives the licensing powers to the Minister in charge of petroleum exploration and production. The **Rwanda Mines, Petroleum and Gas Board (RMB)**, established under Presidential Order N° 028/01 of 18/05/2023, has the mission 'to regulate and manage mineral, quarry, oil and gas' and, in the words of the Ministry of Infrastructure (MININFRA), manages the upstream development of petroleum and gas. Policy is set by the Upstream Petroleum Policy adopted by Cabinet on 12 June 2013 and MININFRA's Energy Policy of February 2025.

Lake Kivu methane, the only hydrocarbon produced in Rwanda, has no statute of its own and is developed through agreements with the Government, with the **Rwanda Utilities Regulatory Authority (RURA)** monitoring technical and safety matters. Downstream trade in fuels, the activity most foreign investors meet first, is governed by **Law N° 85/2013 regulating petroleum and petroleum products trade in Rwanda** and regulated by RURA. Each regime is explained below; the tax regime for mining in Mineral tax, royalties and fiscal terms does not apply to petroleum, whose fiscal terms are set in the petroleum agreement and the general tax laws.

## State ownership and the licence-plus-agreement model

Article 3 of Law N° 13/2016 vests all rights of ownership and control of petroleum on, in or under any land in Rwanda 'only in the State without prejudice to any right of ownership that any person may possess to the land', and provides that no person may explore for or produce petroleum except under a licence issued under the Law **and** a petroleum agreement. 'Petroleum' means crude oil and natural gas recovered from a petroleum reservoir, and a 'person' includes a company or other entity with legal status (Article 2). Exploration and production take place on the basis of a reference map of blocks, to be established by an Order of the Minister (Article 4).

The licence and the agreement are inseparable. The Minister invites an accepted applicant to negotiate an agreement and grants the licence within 7 days after both parties sign it (Articles 6, 7, 21 and 22). Under Article 41 the agreement elaborates the rights and obligations of the parties, and under Article 42 it takes one of five forms: **concession, joint venture, production sharing, service contract or equity participation**. The Law itself sets no royalty, profit split, State participation level or cost recovery limit; those are matters for the agreement, whose format and content are to be fixed by Ministerial Order (Article 43). RMB and the East African Community's petroleum promotion materials state that a model production sharing agreement is offered for the Lake Kivu basin.

The Ministerial Orders the Law calls for, on the reference map, application requirements, the exploration performance guarantee, renewal requirements, decommissioning, reports, transfers, the format of agreements and administrative sanctions (Articles 4, 5, 10, 14, 20, 25, 28, 29, 36, 37, 43 and 44), had not been found by 10 October 2026, and the Energy Policy of February 2025 records that upstream regulations 'are not yet developed'. Until they exist, the petroleum agreement carries almost the whole legal relationship, and its drafting matters more than in a fully regulated regime. Disputes with the Minister go to 'the competent institution in accordance with relevant laws' (Article 27); an investor should negotiate an arbitration clause, explained in Arbitration law and KIAC.

## The exploration licence

A person intending to explore applies to the Minister (Article 5). The Minister answers in writing within **90 days**, inviting the applicant to negotiate an exploration agreement or giving reasons for refusal (Article 6), and grants the licence within 7 days after the agreement is signed (Article 7). The licensee has the exclusive right to explore for petroleum in the exploration area and to carry out the works needed for that purpose only (Article 8).

The licence is valid for **3 years** (Article 9). A renewal must be applied for within the 90 days before expiry; the renewed licence lasts no more than 3 years and is 'renewable only once for not more than two (2) years' (Article 10), so the maximum exploration period is 8 years. RMB's website refers to exploration licences of 'up to six years'; the Law's own figures should prevail. The Minister answers a renewal application before the current licence expires and gives written reasons for a refusal (Article 11).

The licensee must meet the work plan and expenditure stated in the licence and agreement, submit a work plan, projected expenditure and activity report before starting and one month before the end of each year, and may amend the plan by agreement but not so as to reduce the overall work and expenditure committed for the licence term (Articles 12 and 13). Before starting it must show the Minister a guarantee that it will implement the work plan (Article 14). It may relinquish part of the area by written notice given at least 3 months before the intended date (Article 39).

## Discovery, appraisal and the production licence

A discovery must be reported to the Minister in writing within **30 days** (Article 15), and within **90 days** of the discovery the licensee must state whether it is of commercial interest (Article 16). Within **2 years** of a notice that it is, the licensee prepares an appraisal programme for the Minister's approval covering the composition and quality of the petroleum, the depth, thickness and boundaries of the reservoir, well productivity and estimated production capacity (Article 17). The exploration licence over a discovery area may cease to have effect if the licensee does not apply for a production licence in time or the discovery is not of commercial interest (Article 18).

Where appraisal shows a producible reservoir, the exploration licensee has priority to apply for a production licence, but must apply before its exploration licence expires; any other capable person may apply for an area not covered by someone else's valid exploration licence (Article 19). The Minister answers within 90 days and, after an agreement is negotiated and signed, grants the licence within 7 days (Articles 21 and 22). A **production licence** lasts **25 years** (Article 24); a renewal must be applied for within the 12 months before expiry and is for a non-renewable 10 years (Article 25). Where production areas include shared blocks, the Minister may order the licensees to enter into a unit production agreement (Article 26).

## Operations, transfers, cancellation and decommissioning

Licensees must work in a proper and safe manner and in accordance with good oil field practices (Article 30). Flaring natural gas requires the Minister's prior authorisation, except where a Government expert in the area approves it to protect the safety and health of personnel or to avoid damage to property (Article 31). No pipeline may be built, operated, altered or rebuilt without the Minister's written authorisation; the application must explain construction and materials, environmental impact and mitigation and end-of-life removal, and the Minister answers within **30 days** (Article 32). Staff training follows the petroleum agreement, with an annual compliance report (Article 33); measurement and weighing methods need the Minister's approval and may not be changed without it (Articles 34 and 35); and reports and records are due throughout the licence and on its expiry (Article 36).

A **transfer** needs a written application to the Minister, and the Law treats as transfers any sale or assignment of the licence, a mortgage of the licence or seizure of a mortgaged licence, and transfers of 'dominant shares' in a licensee (Article 37). The transferee takes over the transferor's rights and obligations after registration. The Minister may cancel a licence for breach of the Law, the agreement or the licence conditions, and a licence is also cancelled where the Minister has given at least 30 days' written notice of the intention to cancel and the licensee has not remedied the breach (Article 38). On cancellation, expiry or relinquishment, the licensee must remove its materials, plug or close all wells and decommission the area by the deadline in the agreement (Article 40). A production licensee submits a decommissioning plan for approval and makes decommissioning funds available within the period the Minister sets (Articles 28 and 29). Administrative faults and sanctions are left to a Ministerial Order (Article 44), and environmental and social impact assessment rules apply as for any other project (Mining agreements, local content and community).

## The Lake Kivu basin: where exploration stands

Rwanda has no proven oil and no producing petroleum field. Exploration interest centres on the Lake Kivu basin, part of the western branch of the East African Rift. According to the Rwanda update published by the East African Community's petroleum conference secretariat, surveys have acquired 466 km of 2D seismic, 3,438 km of marine gravity and magnetic data and 514 km of further seismic data; the results indicate thermogenic hydrocarbon gas, and neither that update nor RMB's oil and gas page reports any exploration well, RMB listing exploratory drilling as an investment opportunity. Rwanda promoted the basin at Africa Oil Week from 1 to 3 September 2026 and will host the East African Petroleum Conference and Exhibition (EAPCE'27) in Kigali from 9 to 11 March 2027.

Exploration rights over the basin have been granted before, but none has led to an exploration well. From about 2007 the Canadian company **Vanoil Energy** held a technical evaluation agreement with the then Ministry of Natural Resources over about 1,631 km<sup>2</sup> of the East Kivu Graben beneath Lake Kivu, giving it the exclusive right to negotiate a production sharing contract; it carried out seismic work, but no contract was signed, the agreement expired in June 2013 and the parties ended their discussions in January 2014. A Chinese contractor, BGP, won a tender in 2016 before talks with it collapsed, and in February 2017 the Rwandan company **Ngali Mining**, part of Ngali Holdings, was reported to have been awarded petroleum exploration rights in Lake Kivu, with the terms still under negotiation and never published. In October 2018 the Government paused bids from explorers so that it could complete its own surveys first; the 2D seismic acquired in 2021 and 2022 came from that State-led work. On 15 January 2025 RMB told Parliament that the surveys had identified 13 structures favourable for exploratory drilling, first reported in the press as oil wells, a description RMB then corrected, and that it was looking for partners for the next stages. All of this concerns oil and gas trapped in rock beneath the lake. Methane dissolved in the lake water itself is a different resource, already extracted under concessions granted by the Government, as explained below.

We have found no published petroleum agreement or exploration licence currently in force under Law N° 13/2016, and RMB presents exploratory drilling as an open opportunity. Because earlier rights were granted, an investor interested in a block should ask RMB in writing whether any existing agreement, option or right of first refusal, including any arising from the 2017 award, still affects that area before negotiating.

An investor considering a block should therefore expect frontier terms: an agreement negotiated with the Minister, without the Ministerial Orders that would normally fix the application file, the performance guarantee and the model contract. The main legal protections will come from the agreement itself, from the Investment Code, under which energy is a priority sector, and, for a foreign investor from a treaty State, from a bilateral investment treaty ([Investment guarantees, treaties and reporting](#)).

## Lake Kivu methane: the resource and the projects

Lake Kivu, on the border with the Democratic Republic of the Congo (DRC), holds methane dissolved in its deep water. Official estimates differ: RMB gives 60 km<sup>3</sup>; RURA gives around 55 billion cubic metres, renewing at about 120 million cubic metres a year, with a power potential of about 700 MW shared equally between Rwanda and the DRC; and MININFRA's Energy Policy uses 40 billion cubic metres. Any project model should state which estimate it uses.

Two plants extract the gas and generate electricity. **KivuWatt**, developed by a subsidiary of ContourGlobal, has a nominal gross capacity of 26 MW according to Rwanda Energy Group (REG), or 26.4 MW in MININFRA's Energy Policy, and has been in commercial operation since 31 December 2015. **Shema Power Lake Kivu** is designed for 56 MW net output under a 25-year power purchase agreement with REG, whose website states that the plant was generating 37.5 MW and would soon reach full capacity. MININFRA's Energy Policy of February 2025 puts methane capacity at 82.4 MW, or 21.1% of Rwanda's installed generation capacity of 406.4 MW, and the press has reported a further 100 MW of planned capacity not yet implemented. RMB states that KivuWatt and Shema Power Lake Kivu together extract methane to produce up to 92 MW, and that Gasmeth Ltd is developing a project to extract and compress methane as compressed natural gas (CNG) for commercial use, under a concession reported as granted in February 2019; the East African Community expects production of about 40 million standard cubic feet a day in 2028. REG also lists the Kibuye Power 1 pilot in Karongi District (design capacity 3.6 MW, about 3 MW produced), whose barge and onshore plant Symbion Power acquired in 2016 and plans to revive and scale up to 25 MW. The Rwanda Environment Management Authority (REMA) records methane concessions granted to KivuWatt, Shema Power Lake Kivu, Gasmeth and Magma Energies. The lake also holds about 300 km<sup>3</sup> of dissolved carbon dioxide, on RMB's estimate, which RMB promotes as a commercial opportunity (for example as a feedstock for synthesis gas, and for refrigerants, welding and biofuel production); no carbon dioxide extraction project is reported.

## Lake Kivu methane: the legal basis

No statute deals specifically with methane extraction from Lake Kivu. RMB treats it as part of its upstream remit, and RURA's mandate under Law N° 09/2013 of 01/03/2013 establishing RURA covers monitoring and investigation of the technical and safety aspects of the gas sub-sector. Law N° 13/2016 defines petroleum as crude oil and natural gas 'recovered from a petroleum reservoir'; methane dissolved in lake water does not sit easily in that definition, and the projects have instead been structured through agreements with the Government and power purchase agreements with REG. MININFRA's Energy Policy of February 2025 lists the regulation of the gas sub-sector as a gap, and a draft gas law reported in 2019 had not been enacted by 10 October 2026.

Because the lake's gas is stratified and shared, extraction is subject to joint safety rules. On 5 March 2020 Rwanda and the DRC signed a Validation Act adopting revised Management Prescriptions for the safe exploitation of Lake Kivu gas, which set the technical conditions all extraction must respect. Since 2021 compliance has been monitored by REMA, whose Environment Analytics and Lake Kivu Monitoring Division took over the Lake Kivu Monitoring Programme created in 2008 within the Rwanda Energy Group: it inspects the extraction plants for safety and environmental compliance, tracks how re-injected water re-stratifies and follows the stability and ecology of the lake, and checks that operators comply with the Management Prescriptions. The Regional Economic Integration Framework signed with the DRC on 4 December 2025 commits both States to 'the cooperative and sustainable exploitation of methane gas from Lake Kivu for electricity generation and transmission', possibly through the institutions of the Economic Community of the Great Lakes Countries ([Strategic minerals and regional deals](#)). A new methane developer should expect to negotiate a concession or project agreement with the Government, an electricity generation licence from RURA and a power purchase agreement with REG, and to comply with the Management Prescriptions.

## Downstream: importing, storing and selling fuel

Law N° 85/2013 regulating petroleum and petroleum products trade in Rwanda, published in the Official Gazette n° 46 of 18/11/2013, requires any person performing any type of petroleum trade to hold a licence (Article 6), in two categories (Article 7); 'any person' may take part in the trade (Article 24), and a licensee must keep an address in Rwanda (Article 19). Importers, wholesalers and retailers must hold minimum stocks at their own expense (Article 31), on pain of licence withdrawal (Article 37), and the Government holds strategic stocks for emergencies (Article 32). General misconduct is fined RWF 2,000,000 to RWF 5,000,000, with RWF 500,000 a day for repetition (Article 35), and adulteration RWF 5,000,000 to RWF 20,000,000 or withdrawal of the licence (Article 36). The Law places the trade under the Ministry in charge of trade (Article 4), and Prime Minister's Order N° 131/03 of 10/05/2016 designates RURA as the regulator of the trade. RURA's rules include its regulation No 04/R/GP-EWS/RURA/2019 on storage and fuel import and regulations on liquefied petroleum gas (2012, amended 2018), road transport of petroleum products and service stations, and it sets maximum pump prices every two months. The Ministry of Trade and Industry (MINICOM) leads downstream legislation and the strategic reserve requirement.

Storage capacity was about 118 million litres, with targets of 230 million litres by 2029 and 299 million by 2035, and an 8,680 tonne LPG depot was due for completion by July 2026. Fuel import and retail are open to foreign-owned companies on the same licensing terms as Rwandan ones; the practical issues are RURA licensing, the minimum stock obligation, the price cap and foreign exchange for imports, discussed in [Foreign exchange rules](#).

### The statutory clock under Law N° 13/2016

| Step                                                    | Time limit | Article |
|---------------------------------------------------------|------------|---------|
| Minister's answer to an exploration licence application | 90 days    | Art 6   |

| Step                                                  | Time limit                                                                           | Article     |
|-------------------------------------------------------|--------------------------------------------------------------------------------------|-------------|
| Grant of exploration licence                          | 7 days after the agreement is signed                                                 | Art 7       |
| Initial exploration term                              | 3 years                                                                              | Art 9       |
| Renewal application                                   | Within 90 days before expiry; renewed for up to 3 years, then once for up to 2 years | Art 10      |
| Work plan and activity report                         | Before starting and one month before the end of each year                            | Art 12      |
| Report of a discovery                                 | 30 days from discovery                                                               | Art 15      |
| Notice of commercial interest                         | 90 days from discovery                                                               | Art 16      |
| Appraisal programme                                   | 2 years from the notice of commercial interest                                       | Art 17      |
| Production licence application                        | Before the exploration licence expires (priority right)                              | Art 19      |
| Minister's answer to a production licence application | 90 days; licence within 7 days after the agreement is signed                         | Arts 21, 22 |
| Production licence term                               | 25 years                                                                             | Art 24      |
| Production licence renewal                            | Apply within 12 months before expiry; one non-renewable 10-year term                 | Art 25      |
| Pipeline authorisation                                | Minister answers within 30 days                                                      | Art 32      |
| Notice before cancellation                            | At least 30 days to remedy                                                           | Art 38      |
| Relinquishment notice                                 | 3 months (exploration); 12 months (production)                                       | Art 39      |

## DECISION GUIDE

### Which regime applies to my energy project?

A decision guide for an investor in Rwanda's hydrocarbon and fuel sector. Answer in order; the outcome is the usual starting point, not a complete licensing list.

#### Q1 Will you explore for or produce crude oil or natural gas from a reservoir?

**Yes** Law N° 13/2016 applies: apply to the Minister in charge of petroleum, negotiate a petroleum agreement and obtain an exploration or production licence; RMB manages the process.

**No** Continue to Q2.

## Q2 Will you extract methane from Lake Kivu?

**Yes** No dedicated statute: negotiate a project agreement with the Government through RMB, comply with the 2020 Management Prescriptions, and for power obtain a RURA generation licence and a power purchase agreement with REG.

**No** Continue to Q3.

## Q3 Will you import, transport, store or sell petroleum products or LPG?

**Yes** Law N° 85/2013 applies: obtain the relevant RURA licence, hold minimum stocks and follow RURA's storage, LPG, transport and service station regulations and pump price caps.

**No** Continue to Q4.

## Q4 Will you build a storage depot, pipeline or plant on land?

**Yes** Obtain an environmental and social impact assessment certificate through the RDB One Stop Centre, secure land rights and a building permit, and for a petroleum pipeline the Minister's authorisation within 30 days (Article 32 of Law N° 13/2016).

**No** Your activity may fall outside these regimes; check general trade licensing with RDB.

### WORKED EXAMPLE

#### Running the clock on a Lake Kivu basin exploration block

A foreign oil company signs an exploration agreement and receives an exploration licence on 1 February 2027. All dates and events are illustrative.

|                               |                                                                                                                                                           |
|-------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| Initial term                  | 3 years: 1 February 2027 to 31 January 2030 (Article 9).                                                                                                  |
| First renewal                 | Application within the 90 days before 31 January 2030, so from 2 November 2029; renewed for up to 3 years, to 31 January 2033 (Article 10).               |
| Second and last renewal       | Up to 2 years, to 31 January 2035; maximum exploration period 8 years.                                                                                    |
| Discovery                     | Gas found on 10 March 2031: written report by 9 April 2031 (30 days, Article 15); notice of commercial interest by 8 June 2031 (90 days, Article 16).     |
| Appraisal                     | Notice given on 1 June 2031; appraisal programme due by 1 June 2033 (2 years, Article 17).                                                                |
| Production licence            | Applied for before 31 January 2035 (Article 19); granted on 1 July 2034 after the production agreement is signed; 25 years, to 30 June 2059 (Article 24). |
| Renewal of production licence | Application within the 12 months before 30 June 2059; one renewal of 10 years, to 30 June 2069, with no further renewal (Article 25).                     |

**Pipeline to a gas-to-power plant**

Application on 2 September 2035; the Minister must answer within 30 days, by 2 October 2035 (Article 32).

Missing the 90-day renewal window or failing to apply for a production licence before the exploration licence ends can end the company's rights over the discovery (Articles 10 and 18).

The guarantee, reporting format and sanctions will depend on the agreement until the Ministerial Orders required by the Law are made.

## Questions investors ask

### Which law governs oil and gas exploration in Rwanda?

Law N° 13/2016 of 02/05/2016 governing petroleum exploration and production activities. Petroleum belongs to the State, and exploration or production requires both a licence from the Minister in charge of petroleum and a petroleum agreement with the Government, which may be a concession, joint venture, production sharing, service contract or equity participation agreement. RMB manages upstream development.

### How long does a petroleum exploration licence last in Rwanda?

Three years under Article 9 of Law N° 13/2016. A renewal applied for within the 90 days before expiry runs for up to 3 years and may be renewed once more for up to 2 years, giving a maximum of 8 years. RMB's website mentions up to six years, but the Law's figures prevail.

### How long is a petroleum production licence?

Twenty-five years under Article 24 of Law N° 13/2016. The licensee may apply, within the 12 months before expiry, for one renewal of 10 years, which cannot itself be renewed. The exploration licensee has priority to apply for a production licence over its discovery, provided it applies before its exploration licence expires.

### Has oil been found in Rwanda?

No. Exploration in the Lake Kivu basin has acquired 2D seismic and gravity and magnetic data indicating thermogenic gas, but official updates reported no exploration well by 10 October 2026. Exploration rights were granted in the past (a technical evaluation agreement held by Vanoil Energy from about 2007 to 2013, and rights reported awarded to Ngali Mining in 2017), but none led to drilling. Rwanda is promoting the basin and hosts the East African Petroleum Conference and Exhibition in Kigali from 9 to 11 March 2027.

### Who regulates Lake Kivu methane projects?

There is no methane statute. RMB treats methane as part of its upstream remit, RURA monitors technical and safety aspects under Law N° 09/2013, and Rwanda and the DRC apply joint Management Prescriptions validated on 5 March 2020, with compliance monitored by REMA's Lake Kivu Monitoring Division. Power projects also need a RURA licence and a power purchase agreement with REG.

### Can a foreign company import and sell fuel in Rwanda?

Yes. Law N° 85/2013 requires licences for importing, transporting, storing and selling petroleum products, without a nationality condition. RURA is the regulator, licensees must hold minimum stocks, pump prices are capped every two months, and adulteration is fined RWF 5,000,000 to RWF 20,000,000.

#### THE 2027 HORIZON

- EAPCE'27 in Kigali from 9 to 11 March 2027, following Rwanda's promotion of the Lake Kivu basin at Africa Oil Week in September 2026; watch for a licensing round and a published model production sharing agreement.
- The Ministerial Orders required by Law N° 13/2016 on applications, guarantees, the reference map, agreement format and sanctions, which MININFRA's February 2025 Energy Policy says are not yet developed.
- A gas sub-sector law or regulation, identified as a gap in the 2025 Energy Policy, which would give methane extraction a statutory basis.
- Cooperation on Lake Kivu methane under the Regional Economic Integration Framework of 4 December 2025, once it takes effect.
- Compressed natural gas production from Lake Kivu, expected by the East African Community in 2028, and the further 100 MW of methane power not yet implemented.
- Expansion of fuel storage towards 230 million litres by 2029 and commissioning of the 8,680 tonne LPG depot.

### Terms you will meet in the documents

| English             | Kinyarwanda                                | French                       | Meaning                                                                                                                                                                       |
|---------------------|--------------------------------------------|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Petroleum agreement | <i>amasezerano ku bijyanye na peteroli</i> | <i>accord pétrolier</i>      | The agreement between the Government and the licensee setting out their rights and obligations, without which no licence is granted (Articles 2, 3 and 41 of Law N° 13/2016). |
| Production sharing  | <i>kugabana umusaruro</i>                  | <i>partage de production</i> | One of the five forms of petroleum agreement listed in Article 42.                                                                                                            |

| English                           | Kinyarwanda                                      | French                                    | Meaning                                                                                                                   |
|-----------------------------------|--------------------------------------------------|-------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| Equity participation              | <i>kugira uruhare ku mari bwite</i>              | <i>participation au capital</i>           | A form of petroleum agreement in which the State takes a share in the venture (Article 42).                               |
| Exploration licence               | <i>uruhushya rw'ubushakashatsi</i>               | <i>permis d'exploration</i>               | The licence giving the exclusive right to explore for petroleum in an area, for 3 years plus renewals (Articles 8 to 10). |
| Production licence                | <i>uruhushya rw'ubucukuzi</i>                    | <i>permis de production</i>               | The licence to produce petroleum, for 25 years plus one 10-year renewal (Articles 23 to 25).                              |
| Exploration performance guarantee | —                                                | <i>garantie d'exécution d'exploration</i> | Security that the work plan will be carried out, shown to the Minister before exploration starts (Article 14).            |
| Unit production agreement         | —                                                | <i>accord d'unité de production</i>       | An agreement the Minister may order between licensees whose production areas share blocks (Article 26).                   |
| Decommissioning funds             | <i>amafaranga agenewe ibikorwa by'isubiranya</i> | <i>fonds de déclassement</i>              | Money a production licensee must make available for closing the site (Article 29).                                        |
| Flaring natural gas               | <i>gutwika gazi kamere</i>                       | <i>flamboisement du gaz naturel</i>       | Burning gas at the site, which requires the Minister's prior authorisation except for safety emergencies (Article 31).    |

## FOREIGN V RWANDAN INVESTOR

Neither Law N° 13/2016 nor Law N° 85/2013 contains a nationality condition: a 'person' eligible for a petroleum licence is any individual, company or organisation with legal status, and fuel trade licences are open to foreign-owned companies on the same terms. In practice a foreign investor will hold its licence through a company registered in Rwanda, and the petroleum agreement may require training of Rwandan staff (Article 33). Investors from the East African Community (EAC) and COMESA have no special status under these laws.

The difference that matters is protection. Because so much of the regime is contractual, a foreign investor should secure an international arbitration clause and, where available, rely on a bilateral investment treaty; a Rwandan investor depends on the agreement and the Rwandan courts. For Lake Kivu methane the counterpart is also, in effect, the DRC, since the resource is shared and governed by joint prescriptions, and a Congolese investor has no Rwandan investment treaty protection until the Rwanda-DRC treaty is ratified.

## WATCH OUT FOR

- Relying on RMB's 'up to six years' for exploration: the Law gives 3 years plus renewals of up to 3 and 2 years, each on time-limited applications.
- Signing a petroleum agreement that leaves fiscal terms, stabilisation, arbitration and guarantees to Ministerial Orders that do not yet exist.
- Treating 'dominant shares' changes in a licensee as outside Article 37: indirect transfers of control need the Minister's approval.
- Assuming Law N° 13/2016 covers Lake Kivu methane: methane projects rest on agreements, RURA oversight and the Rwanda-DRC Management Prescriptions.
- Quoting one methane resource figure as official: RMB, RURA and MININFRA publish 60 km<sup>3</sup>, 55 and 40 billion cubic metres respectively.
- Running a fuel business without meeting RURA's minimum stock and pump price rules, which carry fines under Law N° 85/2013.

## OFFICIAL SOURCES

- Rwanda Mines, Petroleum and Gas Board: Law N° 13/2016 of 02/05/2016 governing petroleum exploration and production activities, Official Gazette n° 21 of 23/05/2016 — [https://www.rmb.gov.rw/fileadmin/user\\_upload/RMB/Publications/Laws/Petroleum\\_Law\\_230628\\_221132.pdf](https://www.rmb.gov.rw/fileadmin/user_upload/RMB/Publications/Laws/Petroleum_Law_230628_221132.pdf)
- Rwanda Mines, Petroleum and Gas Board: Oil and gas — <https://www.rmb.gov.rw/oilandgas>
- Rwanda Utilities Regulatory Authority: Gas sub-sector (Lake Kivu methane) and downstream petroleum — <https://www.rura.rw/sectors/energy/sub-sectors-and-services/gas>
- RwandaLII: Law N° 85/2013 regulating petroleum and petroleum products trade in Rwanda, Official Gazette n° 46 of 18/11/2013 — <https://rwandalii.org/akn/rw/act/law/2013/85/eng@2013-11-18>
- Rwanda Energy Group: Methane gas power generation — <https://www.reg.rw/what-we-do/generation/methane-gas/>
- Rwanda Mines, Petroleum and Gas Board: petroleum and gas exploration — <https://www.rmb.gov.rw/>
- Offshore magazine: Vanoil extends offshore Rwanda PSC talks (31 January 2013) — <https://www.offshore-mag.com/home/article/16773438/vanoil-extends-offshore-rwanda-psc-talks>
- Africa Energy Intelligence: Rwanda, Vanoil pulls out of Lake Kivu exploration (4 February 2014) — <https://www.africa-energy.com/news-centre/article/rwanda-vanoil-pulls-out-lake-kivu-exploration>
- The EastAfrican: Rwandan firm wins bid to search for oil in Lake Kivu (8 February 2017) — <https://www.theeastafrican.co.ke/tea/business/rwandan-firm-wins-bid-to-search-for-oil-in-lake-kivu-1361524>
- The EastAfrican: Rwanda pauses oil exploration in Kivu (22 October 2018) — <https://www.theeastafrican.co.ke/business/Rwanda-pauses-oil-exploration-in-Kivu/2560-4816542-br4flbz/index.html>
- KT Press: Rwanda Mines, Petroleum and Gas Board on 13 prospective structures in Lake Kivu (15 January 2025) — <https://www.ktpress.rw/2025/01/rwanda-mines-and-petroleum-board-says-13-oil-wells-identified-in-lake-kivu/>
- Rwanda Environment Management Authority: Lake Kivu monitoring — <https://www.rema.gov.rw/our-work/lake-kivu-monitoring>
- Rwanda Environment Management Authority: Environment Analytics and Lake Kivu Monitoring Division — <https://www.rema.gov.rw/about/department/environment-analytics-and-lake-kivu-monitoring-division>

Sanctions, due diligence and reforms: the EU listings of 17 March 2025, the US Treasury designations of 2 March and 25 June 2026 including the Gasabo Gold Refinery, who they bind and the 50 percent rule, what buyers, refiners, lenders and investors must do, Rwanda's own anti-money-laundering duties for mineral dealers, EU and US conflict-minerals rules, the 2024-26 reforms and the 2027 horizon

Reviewed 10 October 2026 · Prepared by a commercial lawyer with over 30 years' international experience · Legal and tax information, not legal advice · [How we check](#) · [Open in the app](#)

## WHAT YOU NEED TO KNOW

- By Council Implementing Decision (CFSP) 2025/510 of 17 March 2025, implementing Decision 2010/788/CFSP on restrictive measures in view of the situation in the Democratic Republic of the Congo, the Council of the European Union listed nine individuals and one entity, among them Gasabo Gold Refinery in Kigali and Francis Kamanzi, described in the Council's announcement as chief executive of the Rwanda Mines, Petroleum and Gas Board, subjecting them to an asset freeze, a travel ban and a prohibition on making funds available to them.
- On 25 June 2026 the United States Department of the Treasury's Office of Foreign Assets Control (OFAC) designated Gasabo Gold Refinery LTD under Executive Order 13413, as amended, together with its chairman, its general manager and three Rwandan mining companies, Bugambira Mines LTD, Wolfram Mining and Processing LTD and Rwinkwavu Mining Corporation LTD, and no general licence accompanied that action.
- On 2 March 2026 OFAC designated the Rwanda Defence Force and four of its senior officers under Executive Order 13413, as amended, and issued DRC-related General License 1 authorising the wind down of transactions involving the Rwanda Defence Force until 12:01 a.m. eastern daylight time on 1 April 2026.
- Under OFAC's rules all property and interests in property of designated persons within United States jurisdiction are blocked and must be reported, entities owned 50 percent or more, directly or indirectly, individually or in aggregate, by blocked persons are themselves blocked, and civil penalties apply on a strict liability basis.
- EU and US sanctions are not Rwandan law: Rwanda's own targeted financial sanctions regime under Article 67 of Law N° 001/2025 of 22/01/2025 concerns terrorist financing and proliferation financing, while dealers in precious metals and stones are reporting persons under Article 8 of that Law and must apply customer due diligence to cash transactions of RWF 15,000,000 or more under Regulations N° 002/FIC/2026 of 22/06/2026.
- Regulation (EU) 2017/821 has required EU importers of tin, tantalum, tungsten and gold to carry out OECD-based supply chain due diligence since 1 January 2021 and is the subject of a review for which the European Commission issued a prior information notice on 11 May 2026 and a call for tenders on 16 June 2026, and United States issuers using those minerals from the Democratic Republic of the Congo or an adjoining country, including Rwanda, must file Form SD each year under section 1502 of the Dodd-Frank Act.

## Why sanctions sit at the centre of mineral due diligence

Between March 2025 and June 2026 the European Union and the United States adopted three sets of measures that reach Rwanda's mineral sector: the European Union listings of 17 March 2025, the United States designations of the Rwanda Defence Force on 2 March 2026, and the United States designations of a Kigali gold refinery and three mining companies on 25 June 2026. This section describes them as the sanctioning authorities' own announcements and legal acts state them. They are measures of foreign governments under their own law; they are not findings of a Rwandan court, they do not change Rwandan law, and each regime provides a procedure by which a listed person may seek removal.

Their practical reach is nonetheless wide. Rwanda's mineral exports are priced and paid largely in United States dollars, sold to refiners and traders in Europe, Asia and North America, and financed by banks with international correspondent relationships. A buyer, smelter, lender, insurer or acquirer connected with the European Union or the United States must be able to show that no listed person, and no entity owned by one, is in its supply chain or its counterparty structure. Sanctions screening has therefore joined licence checks and traceability documents, explained in [3T, gold and traceability](#), as a standard part of any Rwandan mineral transaction.

## The European Union listings of 17 March 2025

On 17 March 2025 the Council of the European Union adopted **Council Implementing Decision (CFSP) 2025/510**, implementing Decision 2010/788/CFSP concerning restrictive measures in view of the situation in the Democratic Republic of the Congo (DRC). According to the Council's announcement of that date, it listed nine individuals and one entity in response to the escalation of the conflict in eastern DRC. Two of the listings concern Rwanda's mineral sector. The entity is **Gasabo Gold Refinery**, based in Kigali, which the Council's announcement states imported gold from regions of the DRC controlled by the M23 armed group. One of the individuals is Francis Kamanzi, described in the announcement as chief executive of the Rwanda Mines, Petroleum and Gas Board (RMB), whom the Council lists in connection with the exploitation of and trade in natural resources. RMB has had a new chief executive since July 2025, as reported in the Rwandan press. The other listings concern leaders of M23 and three officers of the Rwanda Defence Force.

The measures are an **asset freeze**, a **travel ban** into or through the European Union, and a prohibition on European Union citizens and companies making funds or economic resources available to the listed persons. The Council stated that its autonomous measures for the DRC then applied to 32 individuals and 2 entities, alongside 53 listings by the United Nations. European Union sanctions bind persons within the territory of the Union, nationals of Member States wherever they are, companies incorporated in the Union, and any business done in whole or in part within the Union. A listed person may ask the Council to reconsider its listing and may challenge it before the General Court of the European Union.

## The United States designations of 2 March and 25 June 2026

On 2 March 2026 the United States Department of the Treasury announced (press release sb0411) that OFAC had designated the **Rwanda Defence Force** under Executive Order 13413, as amended by Executive Order 13671, citing actions it said threatened the peace, security or stability of the DRC and material assistance to M23, and had designated four senior officers as leaders of the Rwanda Defence Force. On the same day OFAC published **DRC-related General License 1**, 'Authorizing the Wind Down of Transactions Involving the Rwanda Defence Force'; the licence text authorised wind-down transactions only until 12:01 a.m. eastern daylight time on 1 April 2026, and required any payment to a blocked person to be made into a blocked account. Because of the 50 percent rule, any entity owned 50 percent or more by the Rwanda Defence Force, alone or with other blocked persons, is also blocked, whether or not it is named.

On 25 June 2026 the Treasury announced (press release sb0543) the designation under Executive Order 13413, as amended, of **Gasabo Gold Refinery LTD**. According to the announcement, it was designated under two criteria of that Order: having materially assisted, sponsored or provided support

for M23, and involvement in the illicit trade in natural resources of the DRC. OFAC designated at the same time the refinery's chairman, listed as Jean Malic Kalima Karekezi, and its general manager, Bosco Kayobotsi, as owned or controlled by, or acting for, the refinery; and three companies it describes as controlled by the chairman: **Bugambira Mines LTD** (also known as Multiserve Consults Ltd), **Wolfram Mining and Processing LTD** and **Rwinkwavu Mining Corporation LTD**, as owned or controlled by, or acting for, him. OFAC's list of Specially Designated Nationals and Blocked Persons (SDN List) records Kigali and Rwinkwavu addresses, company websites and, for the refinery, its Rwandan company number, which compliance teams should use for matching. OFAC's notice of that day lists no general licence for these designations.

The consequences stated in the Treasury's announcements are the same for both actions. All property and interests in property of the designated persons that are in the United States or in the possession or control of United States persons are **blocked** and must be reported to OFAC. Entities owned **50 percent or more**, directly or indirectly, individually or in the aggregate, by one or more blocked persons are also blocked. Unless authorised by an OFAC general or specific licence or exempt, United States persons and transactions within or transiting the United States may not deal in blocked property, including by providing or receiving funds, goods or services. Civil penalties may be imposed on a strict liability basis, non-United States persons may not cause United States persons to violate the rules or engage in evasion, and the 25 June 2026 announcement states that 'financial institutions and other persons may risk exposure to sanctions for engaging in certain transactions' with designated persons. Delisting is available through OFAC's petition procedure.

## Who is bound, and where Rwandan law stands

The European Union and United States measures bind those within the jurisdiction of the sanctioning authority. A Rwandan company with no European or United States owners, staff, assets, bank accounts or payment flows is not itself subject to them as a matter of law. In practice few mineral businesses are in that position: payments in United States dollars normally clear through United States correspondent banks, buyers and refiners are often European or American or supply customers that are, and international lenders and insurers apply both regimes as a condition of their facilities. Rwandan banks with correspondent relationships typically screen against these lists under their own risk policies.

Rwanda's own sanctions law is narrower. Article 67 of **Law N° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction** concerns targeted financial sanctions related to terrorist financing and proliferation financing, with the role of the National Counter-terrorism Committee set by Prime Minister's Order, and **Regulations N° 001/FIC/2025 of 15/01/2025** relating to targeted financial sanctions require reporting persons to freeze 'without delay but no later than 24 hours'. Those rules apply to the designations made under that regime; they do not, by themselves, give effect in Rwanda to European Union or United States listings. The full anti-money-laundering framework is explained in [Anti-money-laundering and sanctions compliance](#).

## Rwanda's own rules for mineral dealers and exporters

Rwandan law imposes its own controls on the mineral trade, independent of foreign sanctions. Under Article 8 of Law N° 001/2025, **dealers in precious metals and precious stones** are reporting persons, alongside banks, lawyers, accountants and others. Under **Regulations N° 002/FIC/2026 of 22/06/2026** of the Financial Intelligence Centre (FIC), they must apply customer due diligence to occasional cash transactions of **RWF 15,000,000** or more, linked transactions being added together, and report cash transactions at that level to the FIC within two working days; suspicious transactions of any amount, including attempted ones, must be reported within 24 hours, and tipping off is prohibited. A legal person that breaches its preventive duties faces a fine of RWF 5,000,000 to RWF 20,000,000 under Article 66 of the Law, and administrative fines under Regulations N° 001/FIC/2026. Beneficial owners holding 25% or more of shares or voting rights must be identified.

The Mining Law adds provenance offences. Under Law N° 072/2024 of 26/06/2024 on mining and quarry operations, a person found with minerals without proof of origin pays an administrative fine of 10% of their value and the minerals are confiscated for auction (Article 50); possessing illegally extracted minerals is punished by 1 to 3 years' imprisonment (Article 64); and trading in them by more than 5 and up to 10 years and a fine of RWF 60,000,000 to RWF 120,000,000, or RWF 130,000,000 to RWF 150,000,000 for a company, which may be dissolved (Article 65). Export certificates, including the certificate of the International Conference on the Great Lakes Region (ICGLR), are issued through RMB's online Mineral Certification Information System (MCIS). Mineral traders are among the persons deemed authorised to transact in foreign currency under the National Bank of Rwanda (BNR) Directive N° 4230/2025-00042 of 17/09/2025, and anyone crossing the border with RWF 10,000,000 or more in cash or bearer instruments must declare it.

## What buyers, refiners and investors must do

The reference standard is the **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas**. Rwanda states that it adheres to it, the Regional Economic Integration Framework signed with the DRC on 4 December 2025 commits both States to it, and RMB's model agreements require compliance with traceability and certification mechanisms. Its five steps are: establish strong company management systems; identify and assess risks in the supply chain; design and implement a strategy to respond to identified risks; carry out an independent third-party audit of the due diligence of smelters and refiners; and report publicly each year on supply chain due diligence.

Sanctions screening is the layer on top. Every counterparty in the chain, from licence holder and trader to exporter, refiner and logistics provider, should be screened against the European Union consolidated list and the OFAC SDN List, together with its directors, shareholders and beneficial owners, and the ownership of each entity should be traced far enough to apply the 50 percent rule, which aggregates holdings of different blocked persons. Screening should be repeated at each shipment, because designations change. Transaction documents should check the RMB licence, the ICGLR or Mineral Export Certificate, the traceability tags and logbook entries, and the payment route. Industry schemes help but do not replace this work: the Responsible Minerals Initiative suspended its recognition process

for the ITSCI traceability programme in July 2024, as reported in the trade press, while the European Commission recognised the Responsible Minerals Assurance Process for Regulation (EU) 2017/821 on 16 October 2025.

## EU and United States conflict-minerals reporting

**Regulation (EU) 2017/821** has applied since 1 January 2021 to importers into the European Union of tin, tantalum, tungsten and gold, their ores and metals, above set annual volumes. They must carry out supply chain due diligence in line with the OECD Guidance, obtain third-party audits and report. The European Commission published a prior information notice on 11 May 2026 and a call for tenders on 16 June 2026 for a review of the Regulation.

In the United States, section 1502 of the Dodd-Frank Act, codified at 15 U.S.C. §78m(p), requires issuers reporting to the Securities and Exchange Commission that use tin, tantalum, tungsten or gold originating in the DRC or an 'adjoining country', a term that includes Rwanda, to disclose it. The Commission's staff have applied no-action relief to parts of the rule since April 2017, but Form SD remains due by 31 May each year (on 1 June in 2026, because 31 May fell on a Sunday). The disclosure duty falls on the listed buyer, not on the Rwandan exporter, but buyers will ask exporters for the traceability and due diligence information they need ([FAQ 109](#)).

## Investors, acquirers and lenders

Acquiring a Rwandan mining company or licence calls for sanctions and provenance diligence alongside the corporate, tax and land work described in [Due diligence in Rwanda](#). The buyer should identify every direct and indirect shareholder, director and beneficial owner and screen them; review the target's sales to refiners and traders since at least 2024, including any dealings with the persons listed in 2025 and 2026; check the target's ICGLR certificates, traceability records and FIC reporting; and confirm that RMB's licence is in good standing. Transfers of a licence or of shares in its holder need RMB's prior written approval under Articles 16 to 18 of the Mining Law, and the gain is subject to 10% capital gains tax under Law N° 014/2025 of 27/05/2025 ([Mining licences and quarry licences](#)).

Contracts should contain sanctions warranties covering the counterparty and its owners, an undertaking to notify any designation, the right to suspend or terminate without liability if performance would breach applicable sanctions, and a payment clause avoiding channels that would involve blocked persons. Lenders will add sanctions and anti-corruption covenants, and RMB's model agreement already provides that nothing in it permits derogation from laws on anti-corruption, human rights and national security. Where a counterparty becomes listed during a contract, performance must stop to the extent the applicable regime requires, and any wind-down must rely on a licence from the sanctioning authority.

## The reforms of 2024 to 2026

The legal framework for minerals has been rebuilt in two years. **Law N° 056/2024 of 26/06/2024 establishing tax on minerals** took effect on 5 July 2024, cutting royalties to between 0.5% and 3% and adding an export tax on raw minerals. **Law N° 072/2024** on mining and quarry operations took effect on 24 July 2024, keeping the small-, medium- and large-scale mining licences and the special radioactive

minerals licence of the 2018 law, adding a power to grant the Government a free carried interest (Article 49) and setting new faults and penalties. Law N° 014/2025 of 27/05/2025 raised capital gains tax to 10% and extended it to licence transfers. **Ministerial Order N° 003/MoE/25 of 19/08/2025** replaced the environmental and social impact assessment rules. The anti-money-laundering framework was replaced by Law N° 001/2025 of 22/01/2025 and FIC regulations of January 2025 and June 2026.

Institutions and markets changed too. RMB launched competitive licensing rounds through its Mining Investment Pitchbook in May and December 2025, had a new chief executive from July 2025, and on 4 March 2026 the Cabinet appointed new senior managers of RMB, including a Division Manager for Mining Cadastre and Digital Information. Rwanda and the DRC signed their Peace Agreement on 27 June 2025 and the Regional Economic Integration Framework on 4 December 2025, when Rwanda also signed an economic framework with the United States, and in September 2026 the Government took a 25% stake in a tungsten venture with Almonty Industries ([Strategic minerals and regional deals](#)). Several instruments the 2024 Laws require have not yet been made, and RMB continues to apply its 2019 regulations in the meantime ([The Mining Law 2024 and regulators](#)).

### The foreign measures at a glance

| Date          | Authority and instrument                                                                                         | Persons listed relevant to the mineral sector                                                                                                        | Effect                                                                        | Who must comply                                                                  |
|---------------|------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| 17 March 2025 | Council of the European Union; Council Implementing Decision (CFSP) 2025/510 implementing Decision 2010/788/CFSP | Gasabo Gold Refinery (Kigali); Francis Kamanzi, described as RMB chief executive                                                                     | Asset freeze; travel ban; no funds or economic resources to be made available | EU nationals and companies, and anyone acting within the EU                      |
| 2 March 2026  | US Treasury, OFAC; Executive Order 13413 as amended by Executive Order 13671 (press release sb0411)              | Rwanda Defence Force and four senior officers; entities owned 50% or more by them                                                                    | Blocking; DRC-related General License 1 allowed wind-down until 1 April 2026  | US persons, persons in the US and US-dollar transactions clearing through the US |
| 25 June 2026  | US Treasury, OFAC; Executive Order 13413 as amended (press release sb0543)                                       | Gasabo Gold Refinery LTD; its chairman and general manager; Bugambira Mines LTD; Wolfram Mining and Processing LTD; Rwinkwavu Mining Corporation LTD | Blocking; no general licence published with the action                        | As above; non-US persons face exposure for evasion or causing violations         |

## Rwanda's minerals reforms, July 2024 to September 2026

| Date                  | Change                                                                                                             | Instrument or source                         |
|-----------------------|--------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| 5 July 2024           | Royalties cut to 0.5% to 3%; raw-export tax added                                                                  | Law N° 056/2024 of 26/06/2024                |
| 24 July 2024          | New mining law in force; Law n° 58/2018 repealed                                                                   | Law N° 072/2024 of 26/06/2024                |
| 22 January 2025       | New anti-money-laundering law; dealers in precious metals and stones remain reporting persons                      | Law N° 001/2025 of 22/01/2025                |
| 29 May 2025           | Capital gains tax of 10%, covering licence transfers                                                               | Law N° 014/2025 of 27/05/2025                |
| May and December 2025 | Competitive licensing rounds of 10 blocks each                                                                     | RMB Mining Investment Pitchbook              |
| 19 August 2025        | New environmental and social impact assessment rules                                                               | Ministerial Order N° 003/MoE/25              |
| 4 December 2025       | Regional Economic Integration Framework with the DRC; US-Rwanda economic framework                                 | Signed in Washington                         |
| 4 March 2026          | Cabinet appoints new RMB senior managers, including a Division Manager for Mining Cadastre and Digital Information | RMB announcement of 5 March 2026             |
| 22 June 2026          | New FIC anti-money-laundering and sanctions regulations                                                            | Regulations N° 001/FIC/2026 and 002/FIC/2026 |
| 14 September 2026     | Government takes 25% of a tungsten venture                                                                         | Almonty Industries announcement              |

### DECISION GUIDE

#### Can we deal with this counterparty?

A screening guide for a buyer, refiner, lender or acquirer dealing with a Rwandan mineral business. It does not replace sanctions advice in the jurisdictions that apply to you.

#### Q1 Is the counterparty, or any director, shareholder or beneficial owner, on the EU consolidated list or the OFAC SDN List?

**Yes** Stop. Do not make funds or goods available; consider freezing and reporting duties in your jurisdiction; take sanctions advice.

**No** Continue to Q2.

**Q2 Do one or more blocked persons own 50% or more of the counterparty, directly or indirectly, adding their holdings together?**

**Yes** Treat the counterparty as blocked under the US rules; under EU rules assess ownership and control; stop and take advice.

**No** Continue to Q3.

**Q3 Have the minerals passed through, been refined by or been sold by a listed person since its listing?**

**Yes** Treat as a red flag: suspend, investigate the chain of custody and take advice before proceeding.

**No** Continue to Q4.

**Q4 Does the counterparty hold a valid RMB licence, and do the minerals carry an export certificate and complete traceability records?**

**Yes** Continue to Q5.

**No** Do not proceed: minerals without proof of origin are confiscated and illegally extracted minerals may not be traded under Articles 50, 64 and 65 of Law N° 072/2024.

**Q5 Will payment be made through a bank, in a traceable form, below or properly documented above the cash thresholds?**

**Yes** Proceed, keeping records of each check and repeating screening at each shipment.

**No** Restructure the payment: cash of RWF 15,000,000 or more triggers due diligence and reporting, and opaque routes undermine your sanctions defence.

## Before buying, financing or acquiring

Documents and checks to complete and keep on file.

☐ **Ownership map**

A chart of every direct and indirect owner of the counterparty to the ultimate beneficial owners at 25% or more, with each screened.

☐ **Screening record**

Dated results against the EU consolidated list and the OFAC SDN List for the counterparty, its owners, directors, refiners and logistics providers.

☐ **Licence and certificate**

Copy of the RMB licence, checked as current, and the Mineral Export Certificate or ICGLR certificate verified through RMB's system.

- ☐ **Traceability file**  
Tag numbers, logbook entries and chain-of-custody documents from mine to export.
- ☐ **OECD risk assessment**  
A written assessment under Step 2 of the OECD Guidance, with the response under Step 3 for any red flag.
- ☐ **Payment route**  
Bank details matching the counterparty, with no third-party or cash payments outside the FIC thresholds.
- ☐ **Contract protections**  
Sanctions warranties, notification of designation, suspension and termination rights, and audit rights.
- ☐ **Reporting calendar**  
EU importer reports, Form SD by 31 May for US issuers, and FIC reports within two working days or 24 hours as applicable.

## WORKED EXAMPLE

### Screening a tin concentrate supplier

A European smelter is offered 40 tonnes of tin concentrate by a Kigali trading company. The names and holdings are invented and the figures illustrative.

|                                             |                                                                                                                                                                                                                                          |
|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Ownership</b>                            | The trader is owned 30% by Mr A, 25% by Company B and 45% by Ms C. Company B is wholly owned by Company D.                                                                                                                               |
| <b>Screening result</b>                     | Mr A and Company D are on the OFAC SDN List; Ms C is not listed.                                                                                                                                                                         |
| <b>50 percent test</b>                      | Blocked persons' holdings: Mr A 30% directly; Company D 25% indirectly through its wholly owned Company B. Aggregate 30% + 25% = 55%, which is 50% or more, so the trader is itself blocked under the US rules although it is not named. |
| <b>If the holdings had been 30% and 15%</b> | Aggregate 45%: not blocked by ownership alone, but still a high-risk counterparty requiring enhanced due diligence and, for EU purposes, an assessment of control.                                                                       |
| <b>Provenance</b>                           | One lot of concentrate worth RWF 120,000,000 has no proof of origin: if found in Rwanda, it is confiscated and an administrative fine of 10% x RWF 120,000,000 = RWF 12,000,000 is due (Article 50 of Law N° 072/2024).                  |
| <b>Cash</b>                                 | The trader asks for an advance of RWF 18,000,000 in cash. That exceeds the RWF 15,000,000 threshold for dealers in precious metals and stones, triggering customer due diligence and a cash transaction report within two working days.  |
| <b>Outcome</b>                              | The smelter declines the offer, records its screening and assessment, and takes advice on any reporting duty in its own jurisdiction.                                                                                                    |

Under the 50 percent rule, holdings of different blocked persons are added together; a structure that splits ownership into minority stakes does not avoid it.

EU rules turn on ownership and control and are not identical to the US test; both must be applied where both apply.

## Questions investors ask

### Which Rwandan mining businesses are under sanctions?

On 25 June 2026 OFAC designated Gasabo Gold Refinery LTD and three mining companies, Bugambira Mines LTD, Wolfram Mining and Processing LTD and Rwinkwavu Mining Corporation LTD, with the refinery's chairman and general manager. The EU listed Gasabo Gold Refinery on 17 March 2025. Entities owned 50% or more by designated persons are also blocked under US rules. Always check the current lists.

### Do EU and US sanctions apply inside Rwanda?

They are not Rwandan law and bind persons within EU or US jurisdiction. In practice they reach most mineral trade, because payments in US dollars clear through US banks and buyers, refiners and lenders are often European or American. Rwanda's own targeted financial sanctions regime under Law N° 001/2025 concerns terrorist and proliferation financing.

### What is OFAC's 50 percent rule?

Any entity owned 50 percent or more, directly or indirectly, individually or in aggregate, by one or more blocked persons is itself blocked, even if it is not named on the SDN List. Holdings of different blocked persons are added together, so a buyer must map the full ownership chain of every counterparty.

### Was the Rwanda Mines, Petroleum and Gas Board sanctioned?

No sanction against RMB as an institution has been announced. On 17 March 2025 the EU listed Francis Kamanzi, described in the Council's announcement as RMB's chief executive. RMB has had a new chief executive since July 2025, as reported in the press. Dealings with RMB as regulator are not themselves prohibited by the measures described here.

### What due diligence must a buyer of Rwandan minerals carry out?

Follow the five-step OECD Due Diligence Guidance, screen every counterparty and its owners against EU and US lists, check the RMB licence, export certificate and traceability records, and keep evidence. EU importers of tin, tantalum, tungsten and gold must do so under Regulation (EU) 2017/821, and US issuers report on Form SD.

## What anti-money-laundering rules apply to Rwandan mineral dealers?

Dealers in precious metals and stones are reporting persons under Article 8 of Law N° 001/2025. They must apply customer due diligence to cash transactions of RWF 15,000,000 or more, report such transactions within two working days and suspicious transactions within 24 hours, and identify beneficial owners at 25%.

### THE 2027 HORIZON

- Further designations, delistings or licences by the Council of the European Union and OFAC; on 8 December 2025 the Council renewed its DRC restrictive measures until 12 December 2026, so its next renewal decision, and any change to the listings, is due before that date; screening must use the lists current at each transaction.
- The European Commission's review of Regulation (EU) 2017/821, put out to tender in May and June 2026, which may change importer obligations and the treatment of industry schemes.
- Form SD filings for calendar year 2026, due by 31 May 2027, and any change to the SEC staff position on the conflict minerals rule.
- The Responsible Minerals Initiative's decision on recognising the ITSCI traceability programme, suspended in July 2024 and reported as paused until 2026 at the earliest.
- Implementing instruments under Law N° 072/2024 (fees, categorisation, the Licensing Committee Order, free carried interest, the rehabilitation guarantee), a revision of the framework reported in 2026 commentary as aimed at closing loopholes, a national critical-minerals strategy and possible Kimberley Process membership; no bill had been published by 10 October 2026.
- Implementation of the Regional Economic Integration Framework's commitments on traceability, formal payments and harmonised royalties, and EAPCE'27 in Kigali from 9 to 11 March 2027.

## Terms you will meet in the documents

| English                      | Kinyarwanda                                   | French                                               | Meaning                                                                                                                                                             |
|------------------------------|-----------------------------------------------|------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Targeted financial sanctions | <i>ibihano byo mu rwego rw'imari byagenwe</i> | <i>sanctions financières ciblées</i>                 | Asset freezes and prohibitions aimed at designated persons; in Rwandan law, those related to terrorist and proliferation financing (Article 67 of Law N° 001/2025). |
| Freezing                     | <i>guhagarika</i>                             | <i>gel</i>                                           | Prohibiting the transfer, conversion or use of funds and assets of a designated person, required within 24 hours under Regulations N° 001/FIC/2025.                 |
| Customer due diligence       | <i>ubushishozi ku mukiriya</i>                | <i>devoir de vigilance à l'égard de la clientèle</i> | Identifying and verifying a customer and its beneficial owners before or during a transaction (Law N° 001/2025).                                                    |

| English                                       | Kinyarwanda                                              | French                                                    | Meaning                                                                                                                                                                     |
|-----------------------------------------------|----------------------------------------------------------|-----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Beneficial owner                              | —                                                        | <i>bénéficiaire effectif</i>                              | The natural person who ultimately owns or controls an entity, identified at 25% or more of shares or voting rights.                                                         |
| Politically exposed person                    | <i>umuntu ugaragara mu rwego rwa politiki</i>            | <i>personne politiquement exposée</i>                     | A person with a prominent public function, subject to enhanced due diligence (Article 22 of Law N° 001/2025).                                                               |
| Money laundering                              | <i>iyezandonke</i>                                       | <i>blanchiment de capitaux</i>                            | Concealing or using the proceeds of crime, punished by 10 to 15 years' imprisonment (Article 56 of Law N° 001/2025).                                                        |
| Dealer in precious metals and precious stones | <i>umucuruzi w'amabuye y'agaciro n'andi bimeze kimwe</i> | <i>négociant en métaux précieux et pierres précieuses</i> | A reporting person under Article 8 of Law N° 001/2025, with a RWF 15,000,000 cash threshold.                                                                                |
| Reporting persons                             | —                                                        | <i>personnes déclarantes</i>                              | The businesses and professions bound by anti-money-laundering duties under Article 8 of Law N° 001/2025.                                                                    |
| Confiscation                                  | <i>ubunyagwe</i>                                         | <i>confiscation</i>                                       | Court-ordered forfeiture of laundered assets and proceeds of crime (Article 68 of Law N° 001/2025); the Mining Law separately confiscates minerals without proof of origin. |

## FOREIGN V RWANDAN INVESTOR

Sanctions apply according to who the obligated person is, not where the target is. A European or United States investor, buyer or lender is directly bound by its own regime wherever it operates, and a non-United States investor can still be exposed for causing a violation or for evasion. A Rwandan company, or an investor from the East African Community (EAC), COMESA or elsewhere, with no European or United States nexus is not legally bound, but will find that its banks, buyers and insurers apply both regimes as a condition of doing business, so in practice the same screening applies.

Rwanda's own rules make no distinction by nationality. The anti-money-laundering duties of dealers in precious metals and stones, the cash thresholds, the provenance offences of the Mining Law and the export certification system apply equally to Rwandan and foreign-owned businesses, and a foreign-owned trader must identify its own beneficial owners at the 25% threshold like any other company.

## WATCH OUT FOR

- Unnamed entities: under the 50 percent rule a company owned in aggregate 50% or more by blocked persons is blocked although it does not appear on the list.
- Indirect exposure through intermediaries: minerals refined or traded by a listed person and resold through an unlisted company still raise a serious red flag.
- Assuming a change of management or name removes a listing: only a formal delisting by the sanctioning authority does.
- Relying on traceability tags or an industry scheme alone: they do not screen ownership or sanctions.
- Cash payments to dealers at or above RWF 15,000,000, which trigger due diligence and reporting, and unexplained third-party payment routes.
- Contracts without sanctions warranties, notification duties and termination rights, which leave a buyer unable to stop performance lawfully.

## OFFICIAL SOURCES

- Council of the European Union: Democratic Republic of the Congo: EU lists further nine individuals and one entity (17 March 2025), Council Implementing Decision (CFSP) 2025/510 — <https://www.consilium.europa.eu/en/press/press-releases/2025/03/17/democratic-republic-of-the-congo-eu-lists-further-nine-individuals-and-one-entity/>
- US Department of the Treasury: press release sb0543 of 25 June 2026 (Gasabo Gold Refinery LTD and related persons, E.O. 13413) — <https://home.treasury.gov/news/press-releases/sb0543>
- US Department of the Treasury: press release sb0411 of 2 March 2026 (Rwanda Defence Force and senior officials, E.O. 13413) — <https://home.treasury.gov/news/press-releases/sb0411>
- OFAC: Recent actions of 25 June 2026 (SDN List additions, DRC programme) — <https://ofac.treasury.gov/recent-actions/20260625>
- National Bank of Rwanda: Law N° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction — [https://www.bnr.rw/documents/2025\\_AMLCFT\\_LAW.pdf](https://www.bnr.rw/documents/2025_AMLCFT_LAW.pdf)
- European Commission: Conflict Minerals Regulation (EU) 2017/821 — [https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation\\_en](https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation_en)