



Human Rights and Responsible Business Conduct in Tanzania's Graphite Sector: Case Studies from Ruangwa

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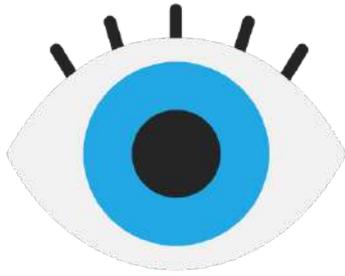
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An overview of the report

This study provides a brief introduction to human rights and responsible business conduct issues arising in the development of Tanzania's graphite sector. Tanzania holds significant deposits of graphite, and it has been identified as one of the critical minerals in Tanzania's Draft Critical and Strategic Minerals Strategy 2025. Graphite is a key mineral not only for Tanzania's mining industry but also for the global energy transition. As mining of graphite is set to scale up, it is important to consider the corresponding human rights and responsible business conduct issues with a view to protecting the environment and the rights of communities as the sector develops.

The study begins with a short introduction to the importance of transition minerals in the energy transition and why graphite in Tanzania is of much interest. It goes on to explain responsible business conduct and why it is important for Tanzania's graphite sector and then provides an illustrative case study of human rights and responsible business conduct issues arising in Tanzania's graphite sector. This is done with a view to sharing insights on what types of environmental and community issues are important to pay attention to as the sector develops. The concluding section provides a list of recommendations to the Tanzanian Government and graphite mining companies that, if implemented, may ensure that mining in Tanzania is conducted responsibly. The important role of civil society organizations is also highlighted.

This study targets policymakers, development partners, mining investors and civil society actors working on business and human rights issues, as well as other interested parties such as academics and members of the community. While this study adds an understanding of human rights dimensions in Tanzania's graphite sector, its findings can be used to inform responsible business conduct in the entire mining sector of Tanzania and related sectors.

1. Introduction

This study provides a short overview of human rights and responsible business conduct issues arising in the development of Tanzania's graphite sector. Transition to a sustainable energy future relies on the widespread adoption of renewable technologies, which are underpinned by a suite of critical minerals referred to as transition minerals in this study. These include lithium, cobalt, nickel, rare earth elements and, notably, graphite, which is integral to the manufacturing of lithium-ion batteries, the dominant energy storage technology for electric vehicles (EVs) and grid storage. In 2023 the International Energy Agency projected that demand for graphite will double by 2030 due to the explosive growth in EV production, making it a cornerstone mineral in global decarbonization efforts (IEA, 2023). More recently they have forecast that the demand for these minerals is expected to triple by 2030 and increase more than 3.5 times by 2050 in a net-zero emissions scenario (IEA, 2024).

High-quality graphite, especially in its natural form, offers superior electrical conductivity and stability, which is necessary for battery anodes. The quality and purity of graphite directly affect battery performance and lifespan, thereby shaping the broader sustainability profile of renewable energy infrastructure. While synthetic graphite is also used in energy storage applications, its contribution to a just energy transition is more complex, as it is typically produced from petroleum-derived feedstocks, raising concerns about its environmental integrity (US Geological Survey, 2025). Hence, as global markets race to secure reliable supply chains, regions rich in high-grade natural graphite are increasingly strategic. Due to the increased global demand, Tanzania has recently witnessed an exploration and investment rush in the graphite sector.

Tanzania's geological advantage lies in its large deposits of high-purity natural graphite, which are recognized as some of the largest in Africa. The country's deposits are characterized by their ultra-high purity (up to 99.9%), offering a competitive edge in global markets. The World Bank (2023) warns that countries that are rich in these resources are at a crossroads of opportunities and challenges. On the one hand, these resources can potentially bring employment opportunities, earnings from foreign investments, and stimulate local economies through potential linkages with other sectors, as well as value addition, particularly if such minerals are well-managed (Kinyondo, 2024b). All these benefits notwithstanding, the human rights and responsible business conduct aspects of mining transition minerals must be taken into consideration.

This is because an increase in activities around transition minerals can only be sustainable if they are conducted in a manner that respects human rights of local communities, safeguards the environment, and upholds transparency and accountability.

In other words, left unchecked, bad practices could have a negative effect by worsening existing inequalities, causing environmental degradation, and fuelling socioeconomic tensions (Tomassi & Kinyondo, 2024; Kinyondo & Huggins, 2021a; Kinyondo & Huggins, 2021b), thereby undermining just transition as envisioned under the Paris Agreement. This positioning aligns with Tanzania's Draft Critical and Strategic Minerals Strategy 2025 (available at: https://www.uongozi.go.tz/newsite/wp-content/uploads/2025/11/Policy-brief_Strategic-minerals_Web.pdf), which emphasises the importance of developing a responsible and sustainable mineral sector capable of contributing significantly to economic diversification and industrialization.

It is against this background that the present study provides a short overview of human rights and responsible business conduct issues arising in the development of Tanzania's graphite sector, based on site research at the Lindi Jumbo graphite project and the Nachu graphite project in the district of Ruangwa, located in the south-eastern Lindi region of Tanzania. This is important because, as graphite mining is set to scale up, it is crucial to consider the potential human rights and responsible business conduct issues that may arise with a view to protecting the rights of communities and the environment as the sector develops.

The specific objectives of this study are to:

- ✓ Provide a short introduction to the importance of transition minerals in the energy transition and to why graphite in Tanzania is specifically of interest,
- ✓ Discuss responsible business conduct and why it is important for Tanzania's graphite sector,
- ✓ Present an illustrative case study of human rights and responsible business conduct issues arising from Tanzania's graphite sector,
- ✓ Offer a short list of recommendations to the Tanzanian Government and graphite mining companies regarding human rights and responsible business conduct.

This study targets policymakers engaged in transition minerals development, and civil society actors working on business and human rights issues. Other potential interested parties include academics, community members, development partners, mining companies and actors interested in understanding the human rights and responsible business conduct dimensions of the mining sector.

PART 2

provides a brief introduction to Tanzania's graphite sector in the context of the global energy transition.

PART 3

gives an introduction to responsible business conduct, including the three pillars of the United Nations Guiding Principles on Business and Human Rights (UNGPs), namely, the state duty to protect, the responsibility to respect, and access to remedy.

PART 4

presents the case study research from the Lindi Jumbo graphite project and the Nachu graphite project in the district of Ruangwa.

PART 5

concludes with some short recommendations for government and graphite mining companies on how responsible business conduct might be strengthened in Tanzania's graphite sector. The important role of civil society organizations is also addressed.

2. Tanzania's graphite sector

Tanzania holds some 18 million metric tons of reserves, equivalent to 5% of the global share as of 2021 (NRGI, 2021; AMDC, 2024). Meanwhile, however, a TEITI report carried out more recently puts the graphite reserve at 158.2 million metric tons (TEITI, 2025). Globally, the five countries with the largest share of graphite reserves are Turkey (27%), Brazil (22%), China (16%), Madagascar (8%) and Mozambique (8%). Tanzania's graphite reserve is primarily distributed across the Lindi, Morogoro and Tanga regions (NRGI, 2021). In terms of exports, Tanzania's graphite destinations in 2020 included China (US\$800,000), India (US\$180,000, Turkey (US\$10,000), and South Korea (US\$10,000).

18
Million
Tanzania holds
metric
tons of reserves,
equivalent to 5%
of the
global share .
0.4%
Tanzania
Global Output

Furthermore, global natural graphite production in 2023 was dominated by China, which accounted for an estimated circa 77% of total world output, with global production in the order of over 1.6 million metric tons of natural graphite. African producers contributed a notable but much smaller share: Mozambique produced approximately 96,000 metric tons, and Madagascar produced around 100,000 metric tons, each contributing roughly 6% of global production, while Tanzania's production was far smaller, at about 6,000 metric tons (around 0.4 %) in 2023. Taken together these figures reflect how output from East African graphite producers fits into broader global supply dynamics (US Geological Survey, 2025; AMDC, 2024). On the other hand, export value in 2023 reached US\$33.5 million for Mozambique, US\$28.6 million for Madagascar, and US\$5.3 million for Tanzania.

There is a potential for Tanzania to engage in the regional value chain by collaborating with neighbouring countries to develop capabilities for lithium-ion battery (LIB) manufacturing. A study presented in the Southern African Development Community conference by Mathe et al. (2022) highlights this potential by siting strategic locations for establishing LIB assembly plants in cities such as Harare (Zimbabwe), Dar es Salaam (Tanzania) and Walvis Bay (Namibia), emphasising regional aspirations to foster sustainable industrial growth and responsible resource governance in line with international standards.

Furthermore, it was reported in September 2023 that EcoGraf is exploring four potential locations, namely Dar es Salaam, Kwala, Ifakara, and Mahenge in Tanzania, to develop a 20 ktpy battery anode material (BAM) processing facility to produce unpurified spherical graphite (Mining See, 2025).

In summary, while Tanzania's graphite industry holds enormous potential for contributing to global energy needs and domestic economic growth, ensuring a just and inclusive development path that respects human rights and promotes community welfare remains paramount. Implementing robust due diligence and actively engaging local communities can help mitigate risks associated with mining operations (Kinyondo, 2024a; Kinyondo, 2024b; Human Rights Watch, 2013; Kolstad & Kinyondo, 2017).

It is against this background that the current research project assesses human rights and responsible business conduct around graphite mining in the context of just transition in Ruangwa district. This study provides valuable insights into governance frameworks, environmental and social safeguards, and the alignment of mining practices with international standards and local expectations. Moreover, it contributes to advocacy efforts aimed at ensuring that the extraction of transition minerals like graphite supports sustainable development, promotes equitable resource distribution, and protects the rights and livelihoods of affected communities. Ultimately, this study is meant to bridge knowledge gaps, inform policymaking, and foster responsible mining practices that align with the global vision for a sustainable, low-carbon future in a manner that ensures that the benefits from mining graphite are maximized subject to advancing a just and inclusive transition.

3. Responsible Business Conduct

This study uses a human rights due diligence and responsible business conduct frame for the case study research and analysis, as this represents globally accepted standards of expected conduct of business enterprises. Responsible business conduct is about ensuring businesses operate in a way that is socially, environmentally and economically responsible, minimizing negative impacts and contributing to sustainable development. Endorsed by the United Nations Human Rights Council in 2011, the UNGPs establish a global, normative framework for preventing and addressing human rights abuses linked to corporate activities. They underscore the obligation of states to protect human rights through appropriate laws and enforcement, while companies are tasked with respecting human rights, and both states and companies are expected to provide effective remedies for affected communities (UN, 2011). This normative guidance is particularly pertinent for resource-rich countries like Tanzania, where mining activities often intersect with vulnerable populations and environmental sustainability challenges.

The rationale for embedding responsible business conduct within Tanzania's growing graphite sector, particularly in the Lindi region, is rooted in recognizing both its substantial economic potential and the attendant risks associated with rapid resource exploitation. Additionally, Tanzania's experience of mining traditional minerals such as gold and gemstones has been associated with adverse human rights impacts at many stages along the mineral value chain (Human Rights Watch, 2013; Kinyondo & Huggins, 2024; Huggins & Kinyondo, 2019; Kolstad & Kinyondo, 2017; Siri & Kinyondo, 2016). Enhancing the implementation of human rights standards in mining operations can mitigate operational disruptions and reduce divestment that can result from human rights abuses, including child labour, failure to respect land rights, breaches of the right to health, sexual and gender-based violence, forced labour, and threats or attacks against human rights defenders.

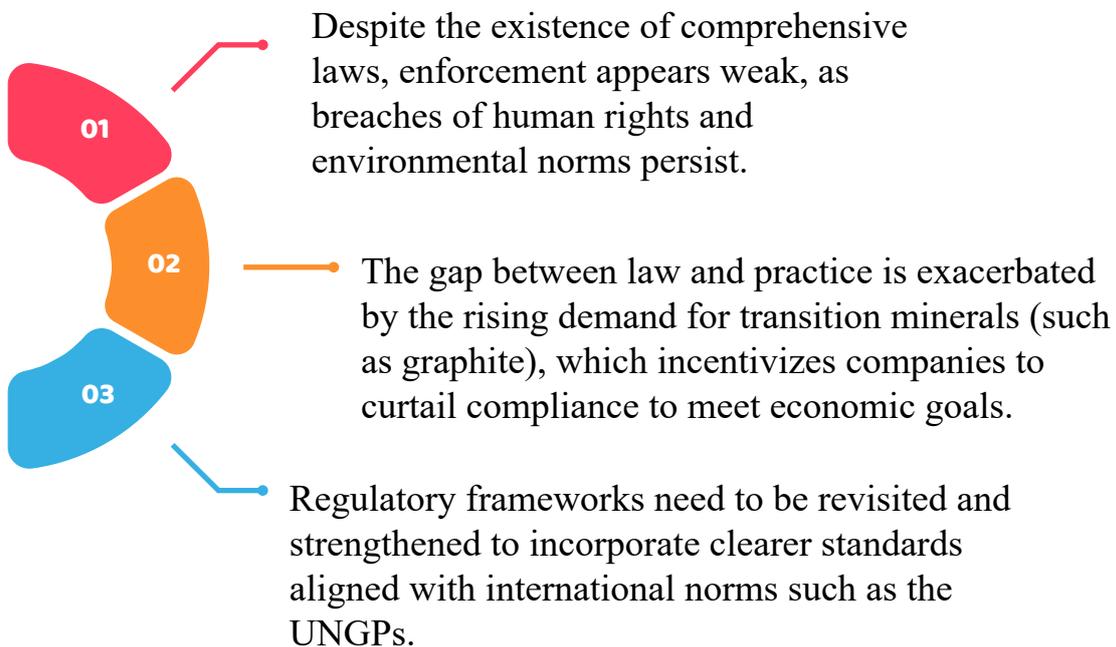
As noted above, the sector presents significant opportunities for economic growth, employment generation and attracting foreign direct investment. However, if not managed responsibly it risks contributing to environmental degradation, social tensions, human rights abuses and reputational damage both for corporate actors and for government institutions (World Bank, 2020). Integrating responsible business conduct into the sector's governance is therefore crucial for fostering sustainable development, ensuring equitable distribution of benefits, and for preventing social conflicts while promoting environmental protection. Such an approach is aligned with international good practices and enhances Tanzania's global reputation by demonstrating a commitment to responsible resource management, compliance with national and international standards, and long-term economic inclusion.

3.1. State Duty to Protect Human Rights

This pillar requires the Tanzanian Government, as the duty-bearer, to enhance enforcement mechanisms and ensure that legal frameworks explicitly address human rights considerations in mining licensing, operations, and community engagement. Moreover, the implementation of robust oversight, and transparency and accountability measures, is imperative to mitigate human rights abuses associated with business activities. Tanzania’s legal landscape for mining is anchored in the Mining Act 2010 (Revised in 2019) and the Mining (Integrity Pledge) Regulations 2018, Land Laws, and the Environmental Management Act 2004, complemented by other sector-specific and general laws. These laws aim to regulate mining activities and promote good governance. However, the existence of laws has not necessarily prevented breaches of human rights from happening. Their efficacy in preventing human rights abuses remains questionable, as evidenced by ongoing reports of abuses worldwide, including in Tanzanian extractive industries.

For instance, the Business & Human Rights Resource Centre (2022) reports 510 allegations of abuse from 2010 to 2022 associated with the mining of six key minerals for the energy transition: cobalt, copper, lithium, manganese, nickel and zinc. Furthermore, 65 new cases of alleged abuse were recorded in 2022, including widespread violations of environmental, land, and indigenous peoples’ rights, coupled with an increase in corruption cases (Business & Human Rights Resource Centre, 2022).

This context suggests the following facts:



3.2. Corporate Responsibility to Respect Human Rights



According to the UNGPs, companies have an independent responsibility to respect human rights. This means that companies are required to proactively avoid causing or contributing to human rights harms, and to prevent or mitigate adverse impacts linked to their operations and relationships, through measures such as human rights due diligence that go beyond legal compliance and apply across all internationally recognized rights (United Nations Human Rights Council, 2011).

Furthermore, the OECD Guidelines on Multinational Enterprises and the Global Reporting Initiative standards provide specific indicators and good practices to embed human rights considerations into corporate governance (OECD, 2016; 2018). Human rights due diligence is a process to identify, mitigate and address adverse, business-related human rights impacts. It is an essential component of responsible business conduct. As outlined in the UNGPs, companies are expected to exercise human rights due diligence as part of their corporate responsibility to respect human rights, and governments are expected to support measures towards its implementation.

Despite this requirement, reports indicate significant human rights abuses linked to mining activities in Tanzania, including land dispossession, limited community engagement and environmental degradation, despite existing legal obligations (IPIS, 2024; MiningWatch Canada, 2023). Many companies lack effective internal policies, grievance mechanisms, or the capacity to recognize and mitigate human rights risks, especially in the context of emerging graphite projects such as in Tanzania. Companies operating in the graphite sector should develop and implement human rights due diligence processes and establish accessible, transparent grievance mechanisms aligned with international good practices to allow affected communities and individuals to seek remedial justice. Human rights safeguards should be integrated into operational policies and supply chains, aligned with international standards such as the UNGPs.



3.3. Access to remedy

The third pillar of responsible business conduct underscores the critical importance of providing victims of human rights abuses with accessible, fair and effective avenues for remedy. As articulated by the UNGPs, the availability of access to effective remedy is fundamental to reversing harm, deterring future abuses, and reinforcing accountability (UN, 2011). Effective remedy mechanisms can be state-based, such as judicial courts and alternative dispute resolution platforms, or non-state-based, including community grievance channels, ombudspersons, and mechanisms established by companies. These processes serve to complement judicial systems by providing accessible and timely redress, especially in contexts where formal judicial avenues may be limited or inefficient.

In the Tanzanian mining sector, existing grievance mechanisms exhibit significant shortcomings. Limited accessibility, lack of transparency, and perceived bias undermine victims' trust and discourage affected communities from seeking redress. This is evident in the case of the Williamson Diamond Mine tailings dam collapse, where local communities reported restricted access to effective compensation and restoration processes, poor communication, and an absence of transparent, trusted channels to voice concerns, highlighting how deficiencies in accessibility, transparency and impartiality hinder meaningful redress (IPIS Weekly Briefing, 2025) Consequently, many grievances remain unaddressed, fuelling social unrest, protests and conflicts, which threaten both community wellbeing and sector sustainability (Human Rights Watch, 2013). This situation underscores the urgent need to strengthen local grievance mechanisms through capacity-building initiatives, promoting independence, and ensuring transparency and community participation.



In sum, despite the existence of many local and international laws, human rights abuses around mining areas are still rampant (Human Rights Watch, 2013; Kinyondo & Huggins, 2024). Against this background the present study set out to examine human rights and responsible business conduct challenges and opportunities associated with Ruangwa district graphite mining in the context of just transition.

4. Graphite site case studies from Ruangwa district

The research was conducted at two graphite mining sites in Ruangwa district of the Lindi region of Tanzania. The first site is the Lindi Jumbo graphite project, located in the ward of Matambalale and operated by Walkabout Resources. The second site is the Nachu graphite project, located in Chunyu ward, operated by Uranex Tanzania. Matambalale ward has 7,511 people, while Chunyu has 7,638 people according to the 2022 census. The total population is expected to grow as a result of the mining activities.

The Lindi Jumbo graphite project, operated by Walkabout Resources (an Australian registered company), progressed to the production phase in 2024, having moved beyond exploration to active mining operations (Walkabout Resources, 2024). The project has a proven and probable ore reserve of five million tonnes at 17.9% TGC (Walkabout Resources, 2024), with expected investment value for bringing the Lindi Jumbo project into full production estimated to be around US\$50 million, covering development, infrastructure and operational costs. The project's anticipated value is driven by high-grade graphite production, with a projected annual revenue potential of US\$100–150 million once fully operational, based on current market prices for high-quality flake graphite.

The Nachu graphite project, operated by Uranex Tanzania, a subsidiary of Ryzon Materials formerly known as Magnis Energy Technologies, is still in the exploration phase but has made substantial progress in mineral extraction and community engagement, with ongoing efforts to ensure sustainable development and fair compensation for residents affected by mining activities (Magnis Energy Technologies Ltd, 2024). Uranex's Nachu project has an estimated resource reserve of approximately 156 million tonnes at around 5.2% Cg, with about 100 million tonnes in measured and indicated categories (Magnis Energy Technologies Ltd, 2024). The overall investment for the Nachu project is currently estimated to be around US\$200–300 million for full development, including infrastructure, processing plants, and community investment, according to projections outlined by Magnis Energy (2024). The large resource base suggests substantial long-term value, with revenue potential estimated at from US\$500 million to over US\$1 billion over the project's lifespan, contingent on market conditions and production scale.

These two sites were selected because they are currently the two biggest graphite investments in Ruangwa. The Lindi Jumbo graphite project was selected because it has already begun active mining operations (in 2024). The Nachu project, on

the other hand, is still in the exploration phase, but it has already made some significant community engagements in the localities surrounding its licensed areas.



In this section of the report, the methodology for the research is briefly described, before discussing the key findings emerging from the field research at the two sites. As the fieldwork was based on the steps of the human rights due diligence process, the findings here are also described and presented under the subheadings of human rights policy, human rights due diligence procedures, community engagement, mitigation and monitoring, as well as operational

4.1 Methodology

The research methodology and process employed in this study was designed to ensure comprehensive and effective data collection, analysis, and capacity-building. A key aspect was the capacity enhancement conducted by HakiRasilimali, focusing on LANGO's capacity needs for undertaking research of this nature and on strategies for successful research implementation. The findings underscore the importance of engaging a consultant as lead researcher, who not only spearheaded the research but also worked closely with LANGO from the design phase through to report production. This collaborative approach aimed to build internal capacity within LANGO by transferring skills and knowledge relevant to research processes.

The consultant was responsible for conducting multiple capacity-building sessions, both virtually and in person, covering critical areas such as literature review, research methodology, and the design and testing of research tools in the field. This hands-on training was aimed at strengthening LANGO's internal capabilities to independently undertake similar research activities in the future.

The study was conducted in Ruangwa district, Lindi region, and employed a qualitative approach. A total of 72 respondents were interviewed (55 males and 17 females), to evaluate human rights and responsible business conduct within the graphite sector. The sample was predominantly male, primarily due to the limited availability of willing female participants, the prevailing male dominance in mining activities, and the timing of data collection during the farming season, when most women are occupied with agricultural work.

Sampling focused on selecting key stakeholders with relevant insights for the study. Participants included 26 community members, 7 local government officers, 9 employees of mining companies, 2 civil society organization members, 5 mining contractors, 6 suppliers, 6 academics, 3 artisanal and small-scale miners, 1 media representative, 3 activists, 2 politicians, and 2 faith leaders. The average age of respondents was 43 years, ranging from 23 to 77, indicating a mature respondent profile. Education levels varied, with 56% having primary education, 22% holding university degrees – primarily the government or company employees – 19% with secondary education, and 3% with diplomas.

Respondent selection was guided by the principal researcher, in collaboration with local leaders who helped identify community members of interest. Despite challenges such as low female participation, limited awareness of sector governance among respondents, and bureaucratic hurdles within the two companies (Lindi Jumbo & Uranex) the data collection process yielded interesting insights on the study's objectives.

Before collecting data, an inception workshop was conducted in Ruangwa that included stakeholders from the district such as the LANGO team, local government officials, civil society organization representatives, community representatives, and faith leaders. After introducing the study to workshop participants, the LANGO team piloted collection instruments on them.

Thereafter data collection was conducted by six LANGO staff members over five consecutive days, followed by data entry and cleaning. Additionally, a desk review evaluated how graphite extraction aligns with international standards such as the UNGPs. Gaps identified by this review informed the development of the interview guide used with the 72 respondents. Thematic analysis, grounded in the UNGPs, was employed to analyse the qualitative data collected in this study.

Following preliminary data analysis, a validation workshop was held in Ruangwa to determine the validity and reliability of results. In order to have balanced results, letters were sent to both Lindi Jumbo and Uranex to seek further elaboration on claims made by respondents. The research team also visited the mining sites of both Lindi Jumbo and Uranex, including the site where Uranex has built houses for relocated families. These steps were taken towards ensuring a balanced and ethical study approach.

4.2. Findings

Human rights policy

The existence of a policy commitment to human rights in a mining company is crucial for ensuring responsible business conduct. Moreover, the policy must be available in the public domain for any concerned person to be able to access.

However, when asked if the human rights policy was available on the company's website or upon request, 5 respondents said no, and another 44 claimed not to know. Of the remaining 23 respondents who claimed that the policy exists in the public domain and has been approved at the highest level of company management, only three were ordinary community members.

Most of the remaining respondents who stated that the policy exists were local government employees (5), mining employees (4), or suppliers (4). A follow-up on the two companies showed that while Lindi Jumbo is yet to have a formal human rights policy, as they are in the process of designing it, Uranex also does not have one, since they have not yet started operations. The fact that some of the local government officials and mining employees claimed that these companies do have a human rights policy while this is not the case, is problematic.

Human rights due diligence procedures

It is also important to assess the existence of the company's human rights due diligence policies and procedures. According to the UNGPs, as part of respecting human rights companies are supposed to have processes in place to assess human rights impacts, mitigation and monitoring, as well as to communicate and report on both the due diligence process and key impacts identified. Almost all respondents (70) acknowledged that they had experienced and could foresee potential human rights impacts as a consequence of the mining operations.

Some of the human rights risks that these respondents mentioned included environmental, air and noise pollution; outbreaks of diseases and ill health such as tuberculosis and high blood pressure; farming land scarcity leading to food insecurity due to displacement; and conflicts between locals and companies, among others. The bleak situation was partly summed up by one respondent who said that the entrance of the mining companies had damaged their livelihoods and threatened their future since there is no available vacant land suitable for farming.

It is reassuring to see that 60 respondents (83%) were of the view that the companies acknowledge the risks associated with their mining practices. Nevertheless, when asked if the company has a dedicated department for human rights due diligence, only five of them said yes. When asked how the company responds to requests regarding its potential human rights impacts and strategies to prevent them, these five respondents indicated that they do so through community relations officers (4) or a complaints book (1) given to local leaders for communities to put their grievances in writing. This conflicting answer indicates that either there is no department to deal with human rights impact complaints and due diligence procedures, or that these are not communicated to the community.

This is consistent with the fact that both Lindi Jumbo and Uranex acknowledged that they do not have dedicated departments that deal specifically with human rights issues. Uranex said that it does not have such a department as it has yet to start operations. Lindi Jumbo, on the other hand, indicated that it addresses human issues across various departments. These include the departments of health, safety, environment, human resources, public relations, and the production department. There is a risk that this is confusing for community members, as they therefore have to deal with multiple organs within the company depending on the matter at hand, and may not be able to identify a clear entry point for human rights-related matters.

Community engagement and communication

As part of due diligence processes, mining companies are expected to communicate potential human rights risks and impacts resulting from their mining practices. Only seven respondents claimed that the companies are willing to do so. In answer to the question, one community respondent stated that the companies only work for their own interests, and not for those of the local communities. It was not surprising to see that only five respondents claimed that assessments that identify rights-holders and other stakeholders that are/may be impacted by the company's operations have been conducted in Ruangwa district by mining companies without leaving any stakeholders out. Furthermore, only five respondents claimed that the mining companies consulted with those potentially affected in the course of their impact assessment and informed them about potential impacts. A quick scrutiny of these five respondents showed that the consultations that they were referring to were done at the time the companies were just launching their projects and trying to compensate community members who had to relocate to other areas. However,

there seems to be no evidence of consultations, whether occasional or on a regular basis, between the companies and communities after company activities had started.

Contrary to international standards, our results further show that there was not a single respondent who thought that potentially affected rights-holders and other stakeholders are involved in the design of the impact assessment and preventive/mitigating measures. This means that the companies do not have an opportunity to integrate feedback from communities into their impact assessments, nor have potentially affected rights-holders and other stakeholders indicated that the due diligence procedures adequately take their concerns into account. Part of the reason why the companies do not engage is the apparently toxic relationship that some of the stakeholders exhibit towards locals. ‘Wamwera hawana akili’ meaning ‘locals are stupid’ was a sentiment expressed openly. This runs contrary to the expectations outlined in the UNGPs and responsible business conduct.

Forty-five respondents (63%) indicated that mining company management decisions have also caused adverse impacts. According to these respondents, this is because the companies sometimes delay paying workers their dues. Moreover, they largely refuse to consult communities on matters that affect them and on the rare occasion when they do, they do not act on people’s grievances. A general sentiment expressed by respondents was that the companies do not take the rights of local community people into consideration when making their decisions. This is consistent with the data, which shows that most of the abuse happens at the companies’ workplaces, their direct surroundings, or around their equipment, as stated by 48 respondents (67%).

Only four respondents believe that the mining companies engage directly with those groups that are impacted in order to understand their concerns. Another respondent stated that there is no good relationship between victims and his company and that even the community relations officer is there only for the company's interests. Respondents were asked to explain if there are other credible sources that the companies rely on to understand the community’s perspectives and concerns. Only ten respondents said that there are other sources. Eight of these respondents believe that the presence of relationship officers is sufficient to involve communities. The remaining two respondents claimed that there is an exercise book that is placed at the office of the village executive officer (VEO) in which all complaints are listed and thereafter sent to the company for further use.

However, the fact that 27 respondents (38%) say nothing like that exists, and a further 35 respondents (49%) stated categorically that they do not know of any other source of information that the companies use for regular communication and monitoring, suggests that the said companies do not have a rigorous monitoring plan in place, which is to the detriment of responsible business conduct. It is not surprising to see that 47 respondents (65%) do not consider the companies' consultation with rights-holders to be meaningful, with only 12 (17%) thinking otherwise. It was widely perceived that the companies are only interested in making profits and that they do not see a need for any meaningful consultations.

Mitigation and monitoring of human rights impacts

In addition to identifying and assessing human rights impacts, responsible business conduct requires mitigation measures on the part of mining companies. In order to ensure responsible business conduct, companies need to have a monitoring system that takes the perspectives of the affected rights-holders into account. This needs to include an action plan that is regularly revised based on tracking and monitoring of impacts and mitigation measures. Such a mitigation and monitoring plan should be reviewed periodically based on results.

Only eight respondents claimed that the companies have identified the occurrence of an adverse human rights impact through their due diligence process. Interestingly, all of the said respondents were mining company employees. The fact that such processes could not be identified by the rest of the respondents is problematic. The notion that the companies ever consulted with human rights-holders was resoundingly rejected by the rest of the respondents. What is worrying is the fact that 57 of the respondents (79%) believe that the mining companies are aware of the negative human rights impact they contribute to the communities. Fewer respondents, 38 (52%), thought the negative impacts were caused by third parties such as the companies' suppliers and contractors

This situation makes them believe that the companies simply ignore the veracity of the impacts. The view expressed by several community members was that the companies are aware of the issues, but they do not care about dealing with them as long as operations keep going. Perhaps more worrying is the fact that 35 respondents (49%) think that the mining companies enable, encourage, facilitate, motivate, increase, or exacerbate the adverse human rights impacts. Only 20 of them (28%) categorically stated no to this question, with the remainder claiming not to know the answer.

Only six respondents claimed that the companies had delivered meaningful action to stop and address adverse impacts in the past. Moreover, the said actions seem to be generally taken against the lower cadre of employees, particularly security guards as opposed to top management who are responsible for making major company decisions. It is not surprising, then, that the majority of respondents (66) did not think that the companies take meaningful action to stop human rights abuses. Besides, respondents stated that no action that was taken by the companies was publicly reported. Importantly, though, none of the respondents think the remedial process in place is multi-stakeholder. As such, any initiative by the companies is bound to be ineffective at providing a fruitful grievance mechanism.

Taking steps to prevent adverse impacts is another responsible business tenet. Unfortunately, only two respondents believed that the mining companies have developed an action plan to prevent adverse human rights impacts and mitigate any past impacts of their doing. Only two respondents claimed that the companies have an action plan to prevent and mitigate human rights abuses. Similarly, only a minority of respondents (6) believed that the companies have a plan to deal with such impacts. The answers from these six respondents were just assumptions and not based on experience of real practices existing in the mining companies. This suggests that the mining companies either do not have action plans in place to prevent human rights abuses or that the action plans are not communicated to the community. A follow-up with both companies confirmed that the companies do not have formal prevention plans.

It seems obvious from the results that the mining companies do not consult the rights-holders who are experiencing the adverse impacts to identify the nature of the adverse human rights impacts. Moreover, it appears from the findings that the mining companies do not consult affected rights-holders to develop concrete and acceptable actions to address the identified impacts. It is not surprising then that only ten respondents perceived that there have been meaningful consultations in the sense that the company demonstrates understanding of rights-holders' concerns. This is also reflected in that only 11 respondents (15%) think affected rights-holders perceive that their views and their dignity, welfare and human rights have been taken seriously and integrated into companies' action plans.

Access to remedy and operational-level grievance mechanisms

In order to ensure responsible business conduct, companies are expected to have in place an operational-level grievance mechanism to address any concerns raised by community members. At the studied sites, only one respondent claimed such a mechanism exists. Further probing showed that two respondents confused a non-judicial mechanism with a compensation exercise that was conducted to relocate communities away from mining areas. This indicates that rights-holders in Ruangwa district may not have access to meaningful operational-level grievance mechanisms.

Apart from the one respondent who claimed that such a mechanism exists, and the eight who indicated that some kind of grievance process exists but demonstrated little understanding of how it works, the rest of the respondents either stated categorically that there is no such mechanism (40 respondents), or they do not know of the existence of an operational-level grievance mechanism (23). Indeed, this was the main reason given for the plentiful criticism of the companies' effectiveness in regard to adverse human rights impacts. People felt that they had been left to suffer grievances without any solutions on offer for a long time because there is no company operational-level grievance mechanism in place. Uranex has been clear in acknowledging that it does not have such a mechanism yet. However, Lindi Jumbo does claim to have one. When probed on how the mechanism works, if at all it exists, an official stated that the company has a public relations officer who is responsible for receiving complaints and grievances from the community. This, however, does not constitute an operational grievance mechanism as envisaged in the UNGPs.

When asked if the mining companies have processes in place through other legitimate grievance mechanisms to enable remediation when human rights concerns are raised, only nine respondents said yes. However, when the said nine respondents were further probed about who exactly in the companies deals with remediation, they all seemed unsure. Most gave general and conflicting answers such as 'the management', 'human resource manager', 'human rights officer', 'the CEO', or 'the Board'. It was clear that these were guesses as none of these nine respondents worked for the mining companies.

Lastly, the majority of community members (38 or 85%) did not accept that the compensation provided was fair because although it was meant to cover both the land and all the crops on the farm, only the land seems to have been

compensated. The respondents felt that the compensation did not match the value of their land. After all, their land produced many crops and was very fertile. However, according to one respondent, they felt powerless to defend their land rights because all land belongs to the government according to the law. It should be noted that Uranex compensated affected communities and built them modern houses that are fully furnished and have water and electricity, among other amenities. These discrepancies between company conduct and community views indicate that further research into the details regarding compensation and the resettlement process is warranted, as well as pointing to the necessity of further dialogue between the company and communities regarding the process and suitability of the resettlement process.

5. Recommendations for strengthening responsible business conduct in Tanzania's graphite sector

The engagement and findings from this study clearly show that there are ample opportunities to enhance responsible business conduct in graphite mining in Ruangwa district. By way of a conclusion, this section provides a number of initial recommendations to the two central duty-bearers: government and companies, outlining concrete actions these actors could take towards enhancing responsible business conduct.

It should be emphasized that the research process, including the validation meeting and subsequent engagement with the companies, has opened up various avenues for further constructive dialogue between Ruangwa stakeholders on human rights due diligence, which could usefully be further pursued with a view to building responsible business conduct in Tanzania's graphite sector.



A. The Tanzanian Government

- i. Ensure that the laws are enforced and mining companies are held accountable for their practices.
- ii. Allow a greater involvement of local government authorities in regulating mining companies, since mining takes place in their localities.
- iii. Align national laws with international standards on responsible mining, including in relation to land and compensation.
- iv. Raise awareness about mining-related human rights impacts and how these can be avoided, mitigated and remediated.
- v. Compel mining companies to disclose human rights impact and human rights due diligence information publicly.
- vi. Ensure regular independent assessments of the human rights and environmental impacts of mining practices on communities.

B. Graphite mining companies

- i. Develop and make publicly accessible comprehensive human rights policies.
- ii. Develop and implement human rights due diligence processes and communicate publicly on these, as well as on potential human rights risks.
- iii. Assign clear responsibilities internally for human rights due diligence processes and addressing human rights matters.
- iv. Undertake regular stakeholder mapping and engagement that includes diverse rights-holders and other stakeholders who may be impacted by mining operations.
- v. Establish an accessible and transparent operational-level grievance mechanism based on the UNGPs eight effectiveness criteria.
- vi. Institute human rights impact prevention and mitigation measures through a clear action plan and subsequent monitoring and review.

Civil society organizations, it should be noted, can also play a vital role in supporting actions towards responsible business conduct. For example, civil society organizations can contribute to building the capacity of communities, local governments, mining companies and artisanal and small-scale miners on responsible business conduct. They can also conduct follow-up studies on ongoing graphite mining activities in Ruangwa with a view to deepening understanding of the issues introduced in this report, thereby further building the knowledge base on human rights issues in the graphite sector, which can be used to inform responsible business conduct. Civil society organizations can

also engage with mining companies in the participatory development of operational-level grievance mechanisms and access to remedy. Last but not least, civil society organizations can play a vital role in facilitating multi-stakeholder dialogues/forums for the purpose of bringing together all key actors, including government, mining companies, civil society, local communities, traditional leaders and development partners, to promote responsible business conduct in Tanzania's graphite sector.



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