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**A Critique of the de-listing
of ZMDC off the European
Union sanctions list**

Centre for Natural Resources Governance

Abbreviations used:

EU	-	European Union
ZDERA	-	Zimbabwe Democracy and Economic Recovery Act
ZMDC	-	Zimbabwe Mining Development Corporation
MMCZ	-	Minerals Marketing Corporation of Zimbabwe
KPCS	-	Kimberley Process Certification Scheme
BRICS	-	Brazil, Russia, India, China and South Africa

1.0 Introduction

On 16 September 2013, the European Union announced that Zimbabwe Mining Development Corporation (ZMDC) would be removed from its list of sanctioned entities, pending formalization by EU Foreign Ministers. According to the statement ZMDC would be allowed to sell diamonds in the European Union from the 25th of September 2013. This paper seeks to discuss the circumstances surrounding the imposition and lifting of sanctions and the effects thereof.

“Government, through ZMDC entered into joint venture agreements with a 50/50 shareholding in the following companies, Mbada, Anjin and DMC. Marange resource is owned 100% by ZMDC. When the Committee began its enquiry in 2010, another company was in operation known as Canadile Miners but it has since been de-listed by government and its special grant was taken over by Marange Resources” (Portfolio Committee on Mines and Energy, 2013). All these have been certified by the Kimberley Process Certification Scheme. These mining companies produced a combined eight million carats of diamonds in 2012 and generated US\$ 563 561 495 in exports.

Centre for Natural Resource Governance argues that merely allowing Zimbabwean diamonds into Europe does not in any way enhance transparency and accountability if the governance pitfalls in Zimbabwe's diamond sector remain. Given rising levels of poverty in Zimbabwe, the Centre further calls on the international community to develop a coordinated strategy of strengthening democracy, good governance and human security in Zimbabwe as opposed to piecemeal solutions.

2.0 Background

The European Union imposed sanctions on particular Zimbabwean individuals and companies in 2002, accusing the Government of Zimbabwe of political violence, human rights violations, emasculating of the judiciary, muzzling of the press, and failure to respect the rule of law particularly private property law.

On 18 February 2002 the EU introduced through the Council Common Position 2002/145/CFSP a list of restrictive measures against the government of Zimbabwe. Under the measures the EU suspended budgetary support and stopped funding for all projects. Later in the year EU went on to impose the following:

- An arms embargo
- Travel bans on 20 individuals
- Freezing of assets belonging to the 20 individuals.

From then on the EU went to extend these sanctions to 41 more individuals. In 2010, the EU went on to exclude Zimbabwe from the EU's 2010 'Everything-But-Arms' scheme which gives developing countries duty free access to the EU for all products, except arms and ammunition.

In March 2013 the European Union de-listed through the Council Decision 2011/101/CFSP, 51 Zimbabweans and 20 companies from their sanctions list. On 16 September ZMDC was de-listed.

The sanctions did not prohibit trade as evidenced by the bilateral exchanges worth US\$875 million between Zimbabwe and EU in 2012. However ZMDC was on sanctions list meaning trade in its minerals and precious stones was prohibited as these were said to be undermining democracy and human rights in Zimbabwe. The EU position on ZMDC was vindicated when diamonds were discovered in Marange in 2006. Since the beginning of commercial diamond mining activities in Marange in 2009, Zimbabwe's diamond sector has been opaque, with little revenue trickling into the treasury. Some of the mining companies are shelf companies which had no prior mining experience whilst others are registered offshore to avoid scrutiny. Investigations by Global Witness in 2012 revealed that military and intelligence officials are involved with some of the companies.

3.0 Other Sanctions

3.1 Kimberly Process Certification Scheme

The KPCS banned diamond exports from Zimbabwe in November 2009 after its fact finding mission 'identified several areas in which it finds Zimbabwe non-compliant with the minimum requirements

of the KPCS'. Following intense lobbying by Zimbabwe and her allies, the KPCS lifted all monitoring and restrictions on Marange diamonds during its plenary in November 2012.. The KPCS had then concluded Zimbabwe had met all its minimum requirements following 3 years of monitoring. The KPCS distanced itself from the contentious issue of diamond revenues, arguing that it was outside its mandate to dictate how governments use their diamond revenues. Nevertheless the KPCS decision was reached at a time Zimbabwe's Ministry of Finance, then under the control of the opposition MDCT, was alleging diamond revenues were being diverted from treasury. The KPCS also poured cold water on human rights abuses in the diamond fields, saying monitoring human rights fell outside its mandate. The European Union, which chaired the Working Group on Monitoring, brokered the Zimbabwe deal which paved way for the removal of ZMDC from the EU sanctions list.

3.2 ZDERA

On 3 October 2013, the Assistant Secretary for the Bureau of African Affairs, Linda Thomas-Greenfield said US Sanctions on Zimbabwe would continue on both companies and individuals. Commenting on the recent elections, she went on to say, "While it was violence-free, we are not convinced it provided an opportunity for all Zimbabweans to express their views in the election. And again, we will be reviewing our sanctions in light of that."

The Zimbabwe Democracy and Economic Recovery Act (S. 494) is an act passed by the United States Congress sanctioned to provide for a transition to democracy and to promote economic recovery in Zimbabwe. It was signed into law by George W. Bush on December 21 2001. ZDERA's policy is to "support the people of Zimbabwe in their struggle to effect peaceful, democratic change, achieve broad-based and equitable economic growth, and restore the rule of law."

3.2.1 Financial restrictions:

The Secretary of the Treasury instructed the US executive director of each international financial institution to "oppose and vote against" the following:

1. Any extension by the respective instruction of any loan credit, or guarantee to the Government of Zimbabwe.
2. Any cancellation or reduction of indebtedness owed by the Government of Zimbabwe to the United States or any financial institution.

3.2.2 Conditions for lifting of these restrictions:

1. Restoration of the rule of law: including "respect for ownership and title to property, freedom of speech and association, and an end to the lawlessness, violence and

intimidation sponsored, condoned, or tolerated by the Government of Zimbabwe, the ruling party and their supporters or entities.

2. Electoral conditions: that Zimbabwe has held a presidential election that is widely accepted as free and fair and the president-elect is free to assume the duties of the office

OR

That the government of Zimbabwe has sufficiently improved the pre-election environment to a degree consistent with accepted international standards for security and freedom of movement and association.

3. Transparent Land Reform: the GOZ has demonstrated a commitment to an equitable, legal, transparent land reform program consistent with agreements reached at the International Donors' Conference on Land Reform and Resettlement in Zimbabwe held in Harare, Zimbabwe in September 1998.
4. Fulfilling the agreement to end the war in the DRC
5. Military and police: the Zimbabwe Armed forces, the ZRP and other state security forces are responsible to and serve the elected civilian government.

3.2.3 Additional actions:

Congress recommended that the USA consult with the EU, Canada and other suitable nations to identify and share information regarding individuals responsible for the breakdown of the rule of law, politically motivated violence and intimidation in Zimbabwe; identify assets of these individuals held outside Zimbabwe; implement travel and economic sanctions against those individuals and their associations and families

3.2.4 Efforts to Repeal ZDERA

Bill S. 3722, the Zimbabwe Sanctions Repeal Act of 2010 was sponsored by Senator James Inhofe but a vote was never taken. He introduced Bill S. 1646 under same name in October 2011. A vote is still to be taken.

The bill is widely perceived to challenge basic humanitarian rights by cutting off necessary aid to citizens. However these claims can be disputed by the fact that Zimbabwe was no longer eligible for many international aid programs by the time ZIDERA was enacted:

1. IMF suspended support to Zimbabwe under a "Stand By Arrangement" in September 1999.

2. The International Development Association (IDA) suspended all structural loans, credits, and guarantees to the Government of Zimbabwe in October 1999. In May 2000, the IDA suspended all funds to the Government of Zimbabwe for ongoing projects.

Zimbabwe was excluded from the list of beneficiaries under the 2001 US sponsored Africa Growth and Opportunities Act (AGOA) which availed US\$200 million for US companies in the textile industry in sub-Saharan Africa.

4.0 The Role of Belgium in Removing ZMDC from Sanctions List

Belgium played an important role in the delisting of ZMDC from the EU Sanctions list. The city of Antwerp in Belgium is the rough diamond capital of the world as 80% of all diamonds are handled through Antwerp. With almost 25% of rough diamonds now coming from Zimbabwe, Belgium wanted to ensure that Zimbabwe's diamonds passed through Antwerp, a situation not possible if ZMDC remained under sanctions. Since 2010 when it emerged Zimbabwe has stockpiled millions of carats, Belgium has been pressing the EU for the lifting sanctions on ZMDC, arguing that sanctions were hurting the Belgian diamond sector and that such a move would improve transparency and ensure diamond revenues are properly accounted for.

Soon after the decision to de-list ZMDC, Belgium's Federal Public Service Economy sent a note to the Antwerp World Diamond Council (AWDC) informing it that EU sanctions on ZMDC had been lifted. They immediately published a statement saying, "Thanks to the support of the Belgian authorities, the decision to lift the restrictive measures will result in diamonds commercialized by the Mines and Minerals Corporation of Zimbabwe (MMCZ) to be sold at their optimal market value instead of the current lower prices in other markets."

Belgium's Foreign Minister, Didier Reynders welcomed the move, saying "[ZMDC] did not participate in the financing of electoral campaign" and went on to state, "[Antwerp is] a centre that offers great guarantees of transparency and respect of certification rules." These claims are unsubstantiated since no political party in Zimbabwe has declared its source of electoral funding.

However Belgium's diamond industry has weakened over the past few years, with more and more diamonds being shipped to low-wage locales – including India and China – for cutting and polishing. Increasing numbers of desperate Antwerp businessmen have turned to shady measures like tax fraud and money-laundering to keep their operations afloat. The International Consortium of Investigative Journalists have produced documents that contain the names of over a hundred diamond merchants with links to Hong Kong, Malay and Singaporean companies set up to avoid

Belgian taxation. In 2001, the Belgian tax officials received a list of approximately 170 Antwerp-based diamantaires and diamond companies who allegedly deposited funds totalling nearly US\$1 billion in the Swiss subsidiary of HSBC Bank in an attempt to evade taxes. Is this the sort of place that offers 'great guarantees of transparency and respect of certification rules'?

5.0 The Chinese Factor

The decision by EU to de-list ZMDC is a purely business decision whose sole purpose is to protect Belgium's diamond industry. The Geopolitical powers, the USA, European Union and the BRICS are engaged in a neo-scramble-for-Africa and with Zimbabwe now producing 25% of the global diamond output and all of them heading into Indian and Chinese markets, the balance of power in the global diamond trade was shifting to the East. The de-listing of ZMDC alone shows the decision has nothing to do with recent elections or any progress made in terms of respect for human rights by the Government. It is also peculiar to note that the European Union has lifted sanctions off the institution mandated to extract diamonds on behalf of the Government but has maintained sanctions on the person in whom the same diamonds are vested: The President.

Delisting of ZMDC means European countries can now place direct orders to Mbada and other diamond mining companies but it's unclear if they will have to go through Chinese connections to have their orders fulfilled. It is still to be seen whether the Marange diamonds will be exported to Antwerp as is intended. One industry expert, John Robertson says, "The diamonds so far appear to have mostly gone to China but it's impossible to know just what proportion has gone there and what proportion of the gem quality stones have ended up in the Chinese market. And it is very unlikely that the Chinese would want to now relinquish them to any other country".

6.0 Effects of the lifting of sanctions on the diamond industry

India imports rough diamonds worth about US\$11 billion per annum, 80% of which are imported from big diamond companies while the rest come from Antwerp. In 2003, 92% of the world's diamonds were cut and polished in Surat, India. However 80% of all rough diamonds are handled through Antwerp and almost 80% of all the world's cut diamonds are sold in New York City.

Small and medium diamantaires in India's Surat region – the world's biggest diamond cutting and polishing centre - had stopped purchasing rough diamonds due to a 20% increase in their price since January 2013, mainly due to a weakening Rupee. Only workers in Surat have expertise to cut and polish Zimbabwe diamonds due to their size and colour.

This begs the question: Why would ZMDC want to sell their diamonds through Antwerp when they can easily skip the middle-man and sell directly to India for a higher price?

The answer can be found in Aniruddha Liddide's (a diamond analyst) comment: "Until now companies based in Belgium, INCLUDING Indian firms, could not buy and import [Marange]rough diamonds into Antwerp. After EU's decision to lift sanctions on ZMDC, firms in Antwerp can now import rough diamonds and sell them to the manufacturers in India and other centres." The companies with the expertise to cut and polish Zimbabwean diamonds are based in Antwerp and thus could not trade with ZMDC while it was under sanctions. These companies would also want to sell their diamonds in New York where the ZMDC is under sanctions under the ZDERA Act.

Zimbabwe has the potential to supply around US\$4 billion worth of diamonds per annum. This flow of cheaper Zimbabwean diamonds onto the European market is set to soften the rough diamond prices of the big diamond mining companies like De Beers, Alrosa, Rio Tinto and BHP Billiton.

Dinesh Navadia, president of the Surat Diamond Association says, "The big diamond companies would be compelled to reduce their rough diamond prices as the cheap Zimbabwe goods have officially entered the market. Tens of thousands of carats of Zimbabwe diamonds would flow into the Surat market. This will end all the problems faced by the small and medium diamantaires".

7.0 Transparency

The imposition of sanctions made it difficult for the diamond mining companies to effectively market and trade their diamonds at competitive prices. Currently, the diamonds are sold at below 25% of the normal price. To circumvent sanctions, the companies are trading their diamonds through unconventional as major international banks, insurance companies and couriers do not want to be associated with Marange diamonds. As a result of these financial restrictions, a number of loopholes have been created leading to fiscal leakages, promotion of corruption and national insecurity.

The granting of diamond mining concessions was done secretly and information about the operations in Marange is withheld from the public. Contracts and operations are not open to scrutiny, audits, taxation or bookkeeping regulations. This makes the industry prone to illicit financial flows in the form of tax evasion, corruption and illegal exploitation of the diamond fields.

7.1 Tax Evasion

The mines that ZMDC has stakes in produced a combined twelve million carats of the gems last year and generated US\$ 563 561 495. The mining companies are required to pay royalties and other taxes

to ZIMRA. Royalties due in 2012 alone amount to US\$ 84 534 224.25 which surpasses the US\$ 81 million that was remitted to Treasury by all mining companies in 2012 (Budget Statement, 2013)

The Parliamentary Committee on Mines and Energy made the following observations: “[It] observed with concern that from the time that the country was allowed to trade its diamonds on the world market, government has not realized any meaningful contributions from the sector. This is despite the fact that production levels and the revenue generated from exports has been on the increase as shown on the table below. There are serious discrepancies between what government receives from the sector and what the diamond mining companies claim to have remitted to Treasury.

YEAR	PRODUCTION (CARATS)	EXPORTS (US\$)
2011	8,719,000	233 741 247
2012	12,000,000	563 561 495
2013	16,900,000 (anticipated)	-

Table 1: Diamonds Production Levels and Revenue Generated from Exports

(Source: Budget Statement: 2013)

In June 2012, the Chairman of Mbada Diamonds, the largest producer of diamonds in the country informed the Committee that their company had remitted over US\$293 million to Treasury. The breakdown of the remittances is shown in the table below:

Line Item	Amount US\$
Royalties	76 192 302.21
Resource Depletion Fee	33 943 338.85
Marketing Fees	5 965 412.89
Dividends	117 202 859.79
Corporate Tax	43 515 858.00
Withholding Tax	17 829 562.32

Table 3: Remittances submitted to Treasury by Mbada Diamonds¹

However, the Minister of Finance in 2013 Budget Statement lamented the low proceeds to Treasury and in 2012 government only received a total dividend of US\$41 million. This was also the same amount that was remitted to the fiscus in 2011. Yet Mbada Diamonds claims it remitted a dividend

of over US\$117 million which is far above what Treasury received for the combined period of 2011 and 2012.” I notice this is a quotation. Need to cite the source

According to the Zimbabwe Mining Development Act (Chapter 21:08 of 1982) Part V, ZMDC is liable to pay corporate tax, withholding tax, resource depletion fees and royalties. ZMDC is also supposed to pay dividends to its shareholders, currently the Government. By law, the financial year of ZMDC ends on 30th of June. ZMDC is expected to prepare and submit a statement of accounts annually for the Minister of Mines. The Accounts of ZMDC have to be audited and the audit report sent to the Mining Development Board and the Minister of Mines.

All the mining companies operating in Marange are expected to remit the following to Treasury:

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|---------------------------|---|-------------------------------------|
| 1. Royalties | - | 15% of revenue |
| 2. Corporate tax | - | 25% of income |
| 3. Resource depletion fee | - | 2.5% of revenue |
| 4. Marketing fees | - | 1.2% of revenue |
| 5. Dividends | - | A share of profits |
| 6. Withholding tax | - | 10% of foreign investor’s dividends |

In their call to have sanctions lifted off ZMDC, Belgian officials estimated that the lifting of the sanctions will increase Zimbabwe’s tax revenues to the tune of US\$400 million annually. This is highly sceptical as there were no conditions of transparency set in lifting the sanctions.

7.2 Corruption

Recent charges levied against the former chairman of the ZMDC, Mr Goodwills Masimirembwa by President Mugabe for allegedly demanding a US\$6 million bribe from a Ghanaian investor could be a microcosm of a sector experiencing severe governance challenges. The secretive and nepotistic nature of the granting of diamond concessions encourages bribery and other forms of corruption. It is also essential to point out that the opaque mining licences were directly issued by the Head of State and Government, President Mugabe. Whilst the President has spoken out against corruption from time to time, he has shown no interest in holding his officials to account. Rather he is accused of shielding them from arrest. The public outcry concerning disappearing diamond revenues should have warranted at least a commission of inquiry but no action has been taken to shed light on Marange operations. Put simply, there is no political will to correct the situation in Marange and

ensure the Zimbabwean people benefit from Marange diamonds. Not even the lifting of the EU sanctions can channel diamond revenues into treasury.

The outgoing Deputy Minister of Mines and Mining Development, Gift Chimankire confirmed an army-owned company holds a 40% stake in Anjin Investments. Research carried out by Global Witness in 2012 revealed that officials of the army are also found on the boards of ZMDC subsidiaries and yet the army has been mandated to protect the diamond fields. This is a major conflict of interest as the same forces whose mandate is to protect Zimbabwean interests is involved in a company that is failing to remit all it owes to the Treasury.

7.3 Will removal of ZMDC from the sanctions list ensure transparency?

The MDC-T has welcomed the removal of sanctions, saying “the proposed lifting of sanctions will remove the excuse by President Mugabe’s government that they are failing to govern because of sanctions”.

There is no doubt the Zimbabwe government has creatively manipulated sanctions to their full advantage. Sanctions have been used to justify corruption and every form of policy failure and mal practices. There are some within government who would want to see sanctions continue so as to justify corruption and closure of democratic space. However the commitment of Zimbabwe to engage with the international community, in particular western countries, is highly questionable.

ZANU PF spokesperson, Rugare Gumbo has been quoted as saying, “[the removal of restrictive measures on ZMDC] doesn’t mean that they are ready to engage with us. They are doing that to ensure that they can be able to trade in diamonds with Zimbabwe. That is why we are saying the removal of sanctions on the ZMDC is not enough”. So what is enough for Zimbabwe? CNRG concurs with Rugare Gumbo that the removal of ZMDC from sanctions is not enough. However we are not sure what ZANU PF requires in order to govern Zimbabwe in a manner that creates an inclusive economy. We argue that the problem is bigger than sanctions. According to observations made by many scholars and politicians, President Mugabe, whilst retaining the figure head status, is no longer in control of ZANU PF. During the tenure of the just ended Inclusive Government (2009 - 2013), the then Prime Minister Morgan Tsvangirai on a number of occasions publicly declared that President Mugabe had lost control of the country. During his campaign trail Tsvangirai said 'Mugabe is a puppet of the military'.

Against this background the lifting of sanctions on ZMDC will benefit those who will buy the diamonds without addressing the internal governance challenges afflicting the Zimbabwean economy.

Global Witness on the other hand has criticized the lifting of sanctions: “The EU should have given more time to investigating these claims [of human rights abuses and corruption] before lifting sanctions. Now it will be left to European consumers and jewellery companies to ensure that Zimbabwe’s tainted diamonds are not sold in our shops”

8.0 Recommendations

1. Synchronizing the international response

The international community ought to speak with one voice. There is need for all countries that have imposed sanctions on Zimbabwe to engage with each other on future engagement with Zimbabwe. Measures should be put in place to ensure that reengagement with Zimbabwe is done in a manner that promotes good governance and human security. The discord in the EU and US policies on Zimbabwe is detrimental to efforts to normalize the situation in Zimbabwe, for the good of its citizens. In as much as there were consultations between the two entities leading to the imposition of sanctions, there ought to be consultations and harmony on the way forward.

2. Addressing the structural governance issues

The problems associated with Marange diamonds are embedded in the company ownership structures. Company ownership structures determine who gets the profits. The power to correct the ownership structures of Marange diamond mining companies lies with President Mugabe. According to Zimbabwe's Mines and Minerals Act (1961) Chapter 21:05 'The dominium in and the right of searching and mining for and disposing of all minerals, mineral oils and natural gases, notwithstanding the dominium or right which any person may possess in and to the soil on or under which such minerals, mineral oils and natural gases are found or situated, is vested in the President, subject to this Act.' Consequently the President invoked these powers to decide and determine who gets the special grants for diamond mining in Marange. Against this background the EU decision to lift sanctions on minerals and retain the same sanctions on the person in whom the minerals is vested is contradictory. There is need to engage Zimbabwe at the highest level rather than in piecemeal fashion. In a normal situation the lifting of sanctions should have been done in consultation with all stakeholders involved. A joint press conference between Zimbabwe and the EU announcing resumption of normal relations between the two would have been appropriate.

3. Giving technical support to the Government of Zimbabwe

Zimbabwe has no history of large scale diamond mining operations. This deficiency manifests itself in the chaotic nature in which the diamond sector has been governed since discovery in 2006.

Zimbabwe requires technical support to improve contract negotiation, taxation, transparency, accountability, value addition and environmental management. It will be highly unfortunate if better governed countries manipulate this weakness to their advantage at a great cost to the human security and development needs of the Zimbabwean people. It will be grossly unfair to citizens of those countries, majority of whom are now seeking to buy ethically sourced products, to be misinformed on how the proceeds from the products they are buying are affecting the Zimbabwean poor.

4. Regulating European Markets

There ought to be a measure by the European Union to force European diamond business to engage with Zimbabwe in a transparent manner. Stiffer penalties must be imposed on European companies that engage in illicit diamond deals with Zimbabwe. The fines must be deposited with the Zimbabwean authorities since it is Zimbabwe that would have suffered prejudice.

5. Local beneficiation

According to the Rio Tinto Group, in 2002 the diamonds produced and released to the market were valued at US\$9 billion as rough diamonds, US\$14 billion after being cut and polished, US\$28 billion in wholesale diamond jewelry, and US\$57 billion in retail sales. The price of diamonds appreciates by 600% when cut, polished and set in jewellery. This makes the local beneficiation of diamonds a very lucrative business. The diamond policy that was adopted by government in 2012 stipulates that *'a quota of all locally produced rough diamonds as set by the Minister of Mines and Mining Development shall be reserved for local beneficiation'*. Zimbabwe is yet to set up a local diamond processing industry and this has cost the country billions in potential revenue. Had all the rough diamonds sold in 2012 been cut and polished locally, the gems would have generated approximately US\$1.06 billion (US\$379 million more). Local beneficiation limits cross-border illicit financial flows. However it appears government is determined to continue selling diamonds at the world's lowest prices for quick 'profits', most of it disappearing into private pockets.

6. Laws that promote transparency

According to the outgoing Parliamentary Portfolio on Mines and Energy, "Government has been procrastinating in introducing a comprehensive law to regulate the operations of the diamond sector. Such a law is critical in that it will clearly highlight the financial system to regulate the industry and to hold any offenders accountable."

Such delays in introducing the law will have a negative bearing in promoting financial accountability and transparency of revenue proceeds from diamonds as well as clearly laying out the policy framework for the benefit of potential investors. Although a diamond policy was formulated in 2012, it does not have the force of law in ensuring there is compliance, transparency and accountability in the industry.

The Ministry of Mines cannot release information about tax payments by diamond mining companies as these are confidential by law i.e. section 34A (3a) of Revenue Authority Act. This legislation limits the provision of information only to total as opposed to disaggregated amounts. In order to ensure there is transparency and accountability in the diamond mining sector, this law must be amended.

References

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