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**T**he global transition to low-carbon energy systems has transformed critical minerals such as lithium, cobalt, graphite, manganese, nickel and rare earth elements into strategic geopolitical assets. These minerals are indispensable for electric vehicles (EVs), battery storage systems, renewable energy technologies and advanced manufacturing. Africa is estimated to hold approximately 30 percent of the world's critical mineral reserves, including significant deposits of cobalt in the Democratic Republic of Congo (DRC), lithium in Zimbabwe, graphite in Mozambique and Madagascar, and manganese in South Africa and Gabon.

At the same time, China has emerged as the dominant player in global critical mineral supply chains, controlling substantial share of extraction, mineral processing, refining, battery manufacturing and electric vehicle production. Today, Chinese companies are among the largest investors in Africa's mining sector. However, China's approach to overseas mining is also evolving after years of weak and limited regulation. Last week China's State Council Information Office has released [China's National Human Rights Action Plan](#) (2026–2030). This also came two months after the China Chamber of Commerce of Metals, Minerals and Chemicals Importers and Exporters (CCCMC) opened a call for inputs into its Sustainable Mining Code, signaling an important shift in Beijing's governance of overseas mining investments.

These developments have significant implications for African countries seeking not only to attract investment but also to leverage the critical minerals boom for industrialization and structural transformation.

## **China's Sustainability in Overseas Mining**

Historically, Chinese mining investments in Africa have attracted criticism over environmental degradation, labour practices, inadequate community consultation and weak transparency. In response to growing international scrutiny and market demands for responsible sourcing, Beijing introduced new frameworks aimed at improving the sustainability of overseas investments.

China's National Action Plan on Business and Human Rights represents an important normative development. Inspired by the United Nations Guiding Principles on Business and Human Rights, the China's NAP encourages Chinese enterprises operating overseas to undertake human rights due diligence, strengthen grievance mechanisms and minimize adverse social and environmental impacts.

Similarly, the CCCMC Sustainable Mining Code provides guidance on environmental management, stakeholder engagement, biodiversity conservation, occupational health and safety, mine closure and community relations. The Code seeks to align Chinese mining operations with international standards

and good practices like the EU frameworks on transparency and accountability, sustainability disclosure requirements among others. In terms of scope, the Code, applies *‘all entities engaged in mineral resource investment, development, and operational activities globally, regardless of their size, ownership structure, or jurisdiction of incorporation. Any organization committed to responsible mining practices may adopt this Code as a guiding reference.’*

China’s NAP and CCCMC’s Sustainable Mining Code, collectively suggest that Chinese companies operating in Africa will increasingly face expectations to demonstrate compliance with Environmental, Social and Governance (ESG) standards. For African countries, these developments potentially provide new leverage to demand better environmental stewardship, stronger community benefits and more responsible mining practices.

## **Critical Minerals and the New Geopolitics of Competition**

China's sustainability initiatives must also be understood within the broader geopolitical contest for critical minerals.

The United States, the European Union, Japan, South Korea and India are all seeking to reduce dependence on Chinese-controlled supply chains. Initiatives such as the United States-led [Minerals Security Partnership](#), the European Union's Critical Raw Materials Act and Forum on Resource Geostrategic Engagement (FORGE) led by the Trump administration, including the recent [G7's Critical Minerals Action Plan](#), all illustrate growing strategic competition over critical minerals.

African countries increasingly find themselves at the centre of this geopolitical competition. Recent deals demonstrate this trend. The United States has supported investments in the Lobito Corridor connecting the DRC and Zambia to Angola's Atlantic coast. The European Union has signed strategic partnerships on critical raw materials with countries such as Namibia, Zambia and the DRC. Last week the US has secured a preliminary deal with Kenya for access to the Mrima Hill rare earth and niobium deposit, valued at \$62.4 billion.

Meanwhile, China continues to consolidate its presence through large-scale investments, acquisitions and infrastructure financing across Africa. This competition presents African countries with unprecedented bargaining opportunities. Governments can potentially leverage competing interests among external powers to negotiate better fiscal terms, local content provisions, infrastructure investments and technology transfer arrangements.

However, geopolitical competition also carries risks. External actors are prioritizing supply chain security over local development objectives, while African countries may become arenas for strategic rivalry rather than equal partners in industrial transformation. This is the new challenge for African countries endowed with critical minerals.

## **Africa's Push for Value Addition and Export Restrictions**

Understandably, one of the most significant developments in recent years has been Africa's growing determination to move beyond the historical model of exporting raw minerals.

Approximately 13 African countries have introduced or announced various forms of export restrictions, export taxes or outright bans on unprocessed minerals. Countries including Zimbabwe, Namibia, Ghana, Tanzania, Malawi, Guinea, inspired by Indonesian export policy on nickel are increasingly seeking to retain greater value domestically.

Zimbabwe banned the export of unprocessed lithium ore in 2022. Namibia subsequently prohibited the export of unprocessed lithium, cobalt, graphite, manganese and rare earth minerals without written approval. Similar policy debates are underway in Zambia, the DRC and several other mineral-producing countries. The rationale behind these measures is noble given that Africa captures only a small fraction of value from global mineral supply chains despite possessing abundant resources. Most value is generated during mineral processing, refining, precursor manufacturing, battery production and advanced manufacturing stages located outside the continent.

However, export restrictions designed to promote mineral local value addition must be carefully designed to comply with World Trade Organization (WTO) rules. Under article XI of the General Agreement on Tariffs and Trade (GATT), WTO members are generally prohibited from imposing quantitative export restrictions, including export bans. Nonetheless, African countries may navigate these constraints through several avenues.

First, temporary export restrictions may be justified under Article XI:2(a) to address critical shortages of essential products. Second, countries may invoke Article XX exceptions, particularly those relating to the conservation of exhaustible natural resources (Article XX(g)), provided that restrictions are applied in a non-discriminatory manner and are linked to broader domestic conservation measures.

Current debates increasingly suggest that outright export bans should be complemented by industrial policies, including export taxes, local content requirements, special economic zones and investment incentives for downstream processing.

## **How Chinese Companies Are Responding**

Contrary to early concerns that export restrictions would discourage investment, several Chinese companies have adjusted their investment strategies to align with host government industrialization agendas.

Zimbabwe provides an important example. Following Zimbabwe's ban on raw lithium exports, major Chinese investors, including Huayou Cobalt, Sinomine Resource Group, Zhejiang Huayou and Chengxin Lithium, accelerated investments in local processing facilities.

Huayou Cobalt, through its acquisition and development of the Arcadia Lithium Mine, has invested hundreds of millions of dollars in processing infrastructure. Recently, the company commissioned the first lithium sulphate plant in Africa and others like Sinomine Resources Group are progressing with constructing additional lithium sulphate processing infrastructure at the Bikita Minerals project.

These investments demonstrate an emerging accommodation between African industrial policies and Chinese commercial interests. Rather than simply exporting raw ores, Chinese companies are increasingly investing in concentration and preliminary processing facilities within Africa.

Nevertheless, most investments remain concentrated in early-stage beneficiation rather than advanced refining, precursor manufacturing or battery production. Much of the higher value-added processing still occurs in China.

Consequently, although export restrictions have stimulated local investment, their transformative developmental impact remains uncertain.

## **Opportunities and Challenges for African Governments**

China's evolving sustainability architecture and willingness to invest in local processing create important opportunities for African countries.

First, responsible sourcing requirements can strengthen environmental governance and improve mining practices. Second, growing Chinese investment in processing facilities can support industrialization and employment creation. Third, geopolitical competition offers African governments greater bargaining power.

However, important challenges remain. Mineral rich countries must carefully balance competing objectives. Excessively stringent export restrictions may undermine investment competitiveness, particularly given intense competition among mineral-producing countries globally. Investors may redirect capital to jurisdictions perceived as more predictable or commercially attractive.

Moreover, local beneficiation policies require complementary investments in electricity, transport infrastructure, skills development and industrial capabilities. Without these enabling conditions, export restrictions alone may fail to generate meaningful industrial transformation.

Therefore, there is a danger that countries may focus narrowly on processing while neglecting broader industrial ecosystem development, including manufacturing, research and innovation.

However, China's recent sustainability initiatives reflect broader changes in global mineral governance. Combined with intensifying geopolitical competition and Africa's assertive industrial policies, these developments are reshaping the relationship between African states and foreign investors.

The emerging landscape presents Africa with a historic opportunity to negotiate a new resource bargain, one that moves beyond extractivism towards industrialization, responsible mining and inclusive development.

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