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# The Permit

Zimbabwe's lithium export control is not a ban. It is a permit.

BRIEF NO. 04 · RESEARCH CUT-OFF: 16 SEPTEMBER 2026 · 22 SEPTEMBER 2026

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*Zimbabwe's lithium export control is not a ban. It is a permit.*

**Koussi Intelligence Brief No. 04** Research cut-off: 16 September 2026

### Executive Summary

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Brief No. 03 described Namibia's critical minerals position as resting on policy instruments enforced through ministerial discretion rather than codified law, and contrasted that with the hard deadline anchoring Zimbabwe's regime. This brief examines what actually governs that deadline. The distinction is narrower than it appeared.

On the published record, Zimbabwe's control on lithium exports is Statutory Instrument 5 of 2023, the Base Minerals Export Control (Unbeneficiated Base Mineral Ores) Order, as amended by Statutory Instrument 57 of 2023. Both were made under the Base Minerals Export Control Act [Chapter 21:05]; SI 5 replaced an earlier lithium-specific order, SI 213 of 2022. Export of unbeneficiated ore requires a ministerial permit. Lithium concentrate at or above set lithia contents — 3 per cent for spodumene, 2.5 per cent for petalite and lepidolite — is classed as beneficiated, and SI 57 provides that permits to export it may be granted only where prescribed conditions are met and the price is not below a floor set by the Minerals Marketing Corporation of Zimbabwe. Contravention of an order, or of the conditions of a permit, is an offence carrying a fine or imprisonment of up to two years. Koussi has not traced amendments made after May 2023.

The measures of 2026 sit on top of that. Exports of raw minerals and lithium concentrate were halted in late February 2026 and resumed under conditions from April. A Mineral Classification and Declaration was signed on 22 May 2026. The end of concentrate exports from January 2027 had been announced by Cabinet in June 2025. Koussi has searched the Statutory Instruments published by Veritas Zimbabwe across SI 2026-036A to SI 2026-148 and located no instrument giving effect to any of these measures. That listing has gaps and the absence is not conclusive. Veritas was asked directly on 16 September 2026; no response had been received at the time of publication. In an interview published on 25 August 2026, Minister of Mines and Mining Development Dr Polite Kambamira referred to the beneficiation requirement as a Government directive. On 19 June 2026 the Lithium Association of Zimbabwe asked government to extend the January 2027 deadline. On 24 June 2026 Minister of Finance, Economic Development and Investment Promotion Mthuli Ncube said the government would maintain it. Koussi has located no record of a legal challenge to the requirement.

The measures in this sequence have been introduced by announcement, several with immediate effect. SI 5 and SI 57 were both made with immediate effect, and the 2026 measures, on the record located, were announced rather than gazetted. The position set out here is the position at publication. It can change without notice.

What that leaves is a regime in which the penalties are statutory and the operation of the control runs through ministerial permits. Whether the January 2027 deadline is itself an exercise of that permit power is not established here. Koussi sets out the instruments and the sequence and leaves the reader to assess the relationship between them.

Against that, the Koussi Compliance Register records the following positions for seven assessed Zimbabwean operators as at 16 September 2026. These are forward- looking assessments of readiness against a future deadline. The prohibition is not in force and none constitutes a finding of current breach.

| Operator                  | Position against 1 January 2027 | Basis                                                                     |
|---------------------------|---------------------------------|---------------------------------------------------------------------------|
| Prospect Lithium Zimbabwe | Compliant                       | Sulphate plant operating and exporting                                    |
| Kamativi Mining Company   | At risk                         | Sulphate plant, commissioning targeted July 2027                          |
| Bikita Minerals           | At risk                         | Sulphate plant under construction, first-phase date disputed in reporting |
| Max Mind Investments      | Non-compliant                   | Sulphate plant announced August 2026 with a stated 19-month build         |
| Sandawana Mines           | Non-compliant                   | Concentrator only; construction not begun as at 31 August 2026            |
| Gwanda Lithium Mine       | Non-compliant                   | Concentrator only; no sulphate plant located in reporting                 |
| Premier African Minerals  | Non-compliant                   | Concentrator only; funding shortfall disclosed by the company             |

Each assessment carries dated sources and is published in full at [koussiintelligence.com/register](https://koussiintelligence.com/register).

This brief maps the instrument, not the politics. It does not argue that the deadline will hold or fall. Where sources conflict, this brief uses the more conservative figure and flags the discrepancy. Where verification failed, this brief says so. The reader should draw their own conclusions. The purpose of this brief is to make those conclusions reachable from the evidence.

## Key Findings

On the published record, Zimbabwe's lithium export control is SI 5 of 2023 as amended by SI 57 of 2023 — a ministerial permit regime under the Base Minerals Export Control Act. It replaced SI 213 of 2022.

Lithium concentrate at or above 3 per cent lithia (spodumene) or 2.5 per cent (petalite, lepidolite) is classed as beneficiated. Permits to export it may be granted only on prescribed conditions and at or above a state floor price.

Contravention of an order or of permit conditions is an offence carrying a fine or imprisonment of up to two years. No statutory instrument has been located for the February 2026 halt, the 22 May 2026 Mineral Classification and Declaration, or the announced January 2027 end of concentrate exports. The search was not conclusive.

The Minister of Mines has described the beneficiation requirement as a Government directive. Separate reporting has described it as codified into law. The two have not been reconciled.

Of seven assessed operators, one is assessed compliant, two at risk and four non-compliant against the January 2027 deadline. These are forward-looking assessments, not findings of breach.

In the first half of 2026, lithium export earnings were reported at US\$746 million, of which US\$672.8 million came from concentrate and US\$73.2 million from lithium sulphate.

Measures in the sequence have been introduced by announcement, several with immediate effect. The position can change without notice.

## 1. The Instrument

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### 1.1 WHAT IS ON THE RECORD

Zimbabwe's lithium export control is made under section 3(1)(a) of the Base Minerals Export Control Act [Chapter 21:05], which allows the Minister of Mines and Mining Development to control the export of base minerals by order. The first lithium-specific order was SI 213 of 2022, gazetted on 16 December 2022. It was repealed within three weeks by SI 5 of 2023, gazetted on 6 January 2023, which extended the control to unbeneficiated base mineral ores generally and expressly includes concentrates within the meaning of base minerals.

Under SI 5, no unbeneficiated base mineral ore may be exported except under written permit of the Minister, granted on application where the applicant shows the ore cannot be beneficiated in Zimbabwe, or for assay samples.

### 1.2 THE LITHIUM RULES

SI 57 of 2023, gazetted on 8 May 2023, added rules specific to lithium. It classes lithium concentrate as beneficiated where spodumene reaches 3 per cent lithia or more, and petalite and lepidolite 2.5 per cent or more. It provides that a permit to export beneficiated lithium may be granted only where the lithium has been handled in accordance with conditions set out in a Schedule, and where the selling price is not below that set by the Minerals Marketing Corporation of Zimbabwe.

A permit to export unbeneficiated lithium is narrower still. The exporter must operate an approved processing plant, or hold approval for one to be fully operational within two years; must be wholly owned by Zimbabwean citizens; and requires the prior concurrence of the President.

The Schedule governs lithium before export: miners must process at an approved processing plant or sell to a party that owns one, and storage, transport and purchase are each controlled by permit or licence.

SI 57 restricts when a permit for beneficiated lithium may be granted. It does not separately state that one is required. Koussi does not resolve that point.

### 1.3 PENALTIES

Both orders record that section 6 of the Act makes contravention of an order, or of the terms and conditions of a permit issued under it, an offence carrying a fine not exceeding level 9 or twice the value of the minerals concerned, whichever is greater, or imprisonment not exceeding two years, or both.

Koussi has not traced amendments to SI 5 made after May 2023.

## 2. The 2026 Measures

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### 2.1 THE SEQUENCE

**June 2025.** Cabinet announced that exports of lithium concentrate would be prohibited from January 2027.

**Late February 2026.** Exports of raw minerals and lithium concentrate were halted with immediate effect. Sources differ on whether the measure was announced on 25 or 26 February.

**April 2026.** Exports resumed under a quota system, reported as allowing six producers to continue exporting concentrate until January 2027 while they establish local processing.

**22 May 2026.** A Mineral Classification and Declaration was signed, designating lithium as a critical mineral. Reporting states that it prohibits export of listed minerals in raw or unbeneficiated form except under a transitional plan approved by the Minister, provides for state shareholding, and requires ministerial approval for mining rights over critical minerals.

**January 2027.** The prohibition on lithium concentrate exports is due to take effect.

### 2.2 HOW THE MEASURES TOOK EFFECT

The measures in this sequence have been introduced by announcement, several with immediate effect. SI 5 and SI 57 were both made with immediate effect, and the February 2026 halt took effect immediately. The 2026 measures, on the record located, were announced rather than gazetted.

## 3. The Gap in the Record

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### 3.1 THE SEARCH

Koussi searched the Statutory Instruments published by Veritas Zimbabwe across the range SI 2026-036A to SI 2026-148, which includes the period in which the 22 May 2026 Declaration was signed. No mining, minerals or beneficiation instrument appears in that range. The listing has gaps at several numbers and the absence is not conclusive.

Veritas was asked directly on 16 September 2026 whether statutory instruments exist for the February 2026 halt, the 22 May 2026 Declaration, and the January 2027 measure. No response had been received at the time of publication.

### 3.2 DIRECTIVE OR LAW

The Minister's own description differs from other reporting. In an interview published on 25 August 2026, Dr Polite Kambamira referred to the beneficiation requirement as a Government directive. Reporting published on 31 August 2026 stated that the government had codified its beneficiation mandate into law, introducing compliance certificates and tracking. Koussi has located no instrument corresponding to the second description, and records the two as unreconciled.

### 3.3 INDUSTRY RESPONSE

On 19 June 2026, at the Chamber of Mines of Zimbabwe Annual Conference in Victoria Falls, the Lithium Association of Zimbabwe asked government to extend the January 2027 deadline to mid-2027, stating that only one of the country's seven major producers was ready to produce lithium sulphate. On 24 June 2026 Minister of

Finance, Economic Development and Investment Promotion Mthuli Ncube said the government would maintain the January 2027 deadline. Koussi has located no record of a legal challenge to the requirement by any operator.

## 4. Where Operators Stand

### 4.1 THE REGISTER

The Koussi Compliance Register assesses seven Zimbabwean operators against the January 2027 deadline. As at 16 September 2026, one is assessed compliant, two at risk, and four non-compliant. Each assessment is forward-looking, dated and sourced, and is published in full at [koussiintelligence.com/register](https://koussiintelligence.com/register). None is a finding of current breach.

| Operator                  | Position against 1 January 2027 | Basis                                                                     |
|---------------------------|---------------------------------|---------------------------------------------------------------------------|
| Prospect Lithium Zimbabwe | Compliant                       | Sulphate plant operating and exporting                                    |
| Kamativi Mining Company   | At risk                         | Sulphate plant, commissioning targeted July 2027                          |
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### 4.2 THE PATTERN

The dividing line is lithium sulphate capacity. One operator has it in production. Two are building it, with commissioning dates reported for 2027. Four have concentrators only, or a sulphate plant announced too recently to be built before the deadline on the operator's own stated timeline.

Prospect Lithium Zimbabwe's plant has a nameplate capacity of 50,000 tonnes per annum and was observed operating at 60 per cent of that level during a ministerial visit on 17 July 2026. A capacity of 80,000 tonnes appears in some reporting; this brief uses 50,000 tonnes, the figure given independently in two sources.

### 4.3 THE SECTOR IN NUMBERS

Minerals Marketing Corporation of Zimbabwe data reported in August 2026 put first-half 2026 lithium export earnings at US\$746 million. Concentrate accounted for US\$672.8 million and lithium sulphate for US\$73.2 million.

## 5. What to Watch

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**Whether an instrument appears.** A gazetted statutory instrument giving effect to the January 2027 measure would settle its legal form.

**Whether the deadline moves.** The Lithium Association of Zimbabwe has asked for an extension; the Minister of Finance has said the deadline will be maintained. A regime introduced by announcement can also be varied by announcement.

**How the transitional plan mechanism operates.** The 22 May 2026 Declaration is reported to allow exports under ministerial transitional plans. How those plans are granted, and to whom, is not on the public record.

**Commissioning dates.** Kamativi's targeted July 2027 date, Bikita's disputed first-phase date, and Max Mind's nineteen-month build determine how the at-risk and non-compliant positions develop.

**The Veritas response.** Any answer will be published as a dated update to this brief.

The register is reviewed on a rolling basis and each change is recorded as a new, dated assessment. Earlier assessments remain on the record.

### PRIMARY SOURCES

Statutory Instrument 5 of 2023, Base Minerals Export Control (Unbeneficiated Base Mineral Ores) Order, 2023. Published by Veritas Zimbabwe.

Statutory Instrument 57 of 2023, Base Minerals Export Control (Unbeneficiated Base Mineral Ores) (Amendment) Order, 2023 (No. 1). Published by Veritas Zimbabwe.

Veritas Zimbabwe, Statutory Instruments listing, reviewed September 2026.

Koussi Compliance Register, [koussiintelligence.com/register](https://koussiintelligence.com/register), as at 16 September 2026.

## Notice

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Sources are cited throughout so that readers can verify each claim and reach their own conclusions. Where verification was not possible, this is stated in the text.

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