Balancing peace-making aims with strategic trade goals: The EU's approach to conflict in the Great Lakes region of Africa.

By

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Vienna, 2 June 2025

Ben Fernandes

Abstract

The Democratic Republic of the Congo (DRC) is home to one of the world's largest and most complex humanitarian crises. Since March 2022, violence in eastern DRC has spiked again following a renewed offensive by the Rwandan-backed armed group M23. The intensification of the conflict has resulted in a progressive increase in global attention, particularly since early 2025 when M23 was able to seize the city of Goma, the largest city in the DRC's east. Subsequently, international actors and organisations have considered how best to address the crisis unfolding.

This thesis examines how the European Union (EU) interacts with countries in the Great Lakes region, bearing in mind its pursuit of natural resources and concurrent efforts to attain peace in the region. In particular, the paper focuses on the case study of EU interactions with Rwanda, one of the Great Lakes' most important players, to assess how effective and consistent the EU's approach is to balancing trade with its desire to be a peace-making actor.

This thesis argues that the EU's approach to conflict in the Great Lakes region is mired with inconsistencies that limit its capacity as a peacemaker. By using the case study of EU interactions with Rwanda, this paper demonstrates that the EU has struggled to balance its strategic trade goals with its peace-making aims, with the two objectives sometimes working contrary to one another. Additionally, this paper finds that the desynchronised nature of the EU's approach to the Great Lakes historically can still be identified today.

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CEU eTD Collection

List of Abbreviations and Acronyms

CMR: Conflict Minerals Regulation

CSDDD: Corporate Sustainability Due Diligence Directive

DRC: Democratic Republic of the Congo

EAC: East African Community

EPF: European Peace Facility

ESG: Environmental, Social, and Governance

EU: European Union

EUSR: European Union Special Representative

FARDC: Forces armées de la république démocratique du Congo (Armed Forces of the

Democratic Republic of the Congo)

FDLR: Forces démocratiques de libération du Rwanda (Democratic Forces for the

Liberation of Rwanda)

GAO: Government Accountability Office

GDP: Gross Domestic Product

LNG: Liquefied Natural Gas

M23: March 23 Movement

MEP: Member of European Parliament

MoU: Memorandum of Understanding

NATO: North Atlantic Treaty Organisation

NGO: Non-Governmental Organisation

OECD: Organisation for Economic Co-operation and Development

SADC: Southern African Development Community

RDF: Rwandan Defence Force

1. Introduction

The Democratic Republic of the Congo (DRC) is home to one of the world's largest and most complex humanitarian crises. It is one of the longest running conflicts globally, with intricate dynamics where multiple state and non-state armed groups are active, contributing to a hostile environment with ethnic grievances and cycles of violence. The most recent spike in the conflict began on 27 March 2022, where the largest active rebel group, M23, began a series of military offensives in eastern DRC. The fighting in the DRC's east has left it with a current total of 7.3 million internally displaced people and millions of refugees currently displaced in a scattered manner across borders in the Great Lakes region (UNHCR 2025).

Simultaneously, the DRC's territory is some of the most mineral rich land on Earth. In conflicts past and present, minerals have been a key issue, with armed groups seizing control of mines and illegally extracting rents on natural resources, often smuggling them out of the country and using the revenue to fund military operations (Samset 2002). In particular, the DRC holds by far the largest reserves of coltan globally (Kalantzakos 2019), an essential component of modern electronics, and a mineral which is critical for the global green energy transition. The widespread presence of valuable resources makes the DRC, or anyone who has access to its minerals, an attractive trading partner. However, the lack of control that the DRC government exercises over many of its mineral reserves and mines, mean that international trading partners can be faced with a moral dilemma when importing minerals from the Great Lakes region – knowing that they could be financing military campaigns or rebel groups.

Since the beginning of 2025, the conflict in eastern DRC has escalated, with M23 advancing and taking control of Goma, the provincial capital of North Kivu and a city of two million people. This escalation has been accompanied with increasing claims of interference in

the conflict by neighbouring states, primarily Rwanda. The intensification of the conflict has resulted in a progressive increase in global attention, with international actors and organisations considering how best to address the crisis unfolding.

This thesis examines how the European Union (EU) interacts with countries in the Great Lakes region, bearing in mind its pursuit of natural resources and concurrent efforts to attain peace in the region. In particular, the paper focuses on the case study of EU interactions with Rwanda, one of the Great Lakes' most important players, to assess how effective and consistent the EU's approach is to balancing trade with its appreciation of the ongoing regional conflict. As the paper will demonstrate, the EU's trade goals in the Great Lakes are essentially synonymous with its pursuit for strategic raw materials. Especially in the current global context, with the EU looking to diversify its supply chain and its quest to secure critical minerals for the energy transition, the minerals in the Great Lakes region of Africa are of interest to European leaders, and this paper will show how the EU balances that with its desire to be a peace actor and to not contribute financially to the facilitation of further violence.

This paper will start by examining how scholars have analysed the Congolese conflict in the past and forming a picture of how exactly the violence is manifesting itself today, as well as the EU's historical interactions with it. The paper will then examine the EU's 2023 'renewed EU Great Lakes Strategy', a strategic document intended to establish the EU's priorities when engaging with the Great Lakes region. Then, it will identify key interactions that the EU has had with Great Lakes countries since the most recent surge in violence, 27 March 2022. By doing this, it will assess how coherent the EU's balancing of trade goals with peace-making aims has been, compare how aligned its interactions have been with its renewed Great Lakes strategy, and situate the EU's actions within a historical context to identify points of change.

This paper argues that the EU's approach to conflict in the Great Lakes region is mired with inconsistencies that limit its capacity as a peacemaker. While acknowledging the fragile and complex environment that it is operating in, by using the case study of EU interactions with Rwanda, this paper demonstrates that the EU has struggled to balance its strategic trade goals with its peace-making aims, with the two objectives sometimes working contrary to one another. Additionally, this paper finds that the desynchronised nature of the EU's approach to the Great Lakes historically can still be identified today.

2. Historical and Contextual Background

2.1. Historical Legacy of Conflict

In the wake of the 1994 Rwandan genocide, ethnic tensions and violence spread across borders into what was then Zaire, exacerbating inter-ethnic tensions that were already present (Weiss 2000). As Tutsi President Paul Kagame emerged as the leader of Rwanda, the situation for ethnic Tutsi's deteriorated in modern day DRC and Rwanda-Zaire relations worsened too (Autessere 2010). The product of this was the First Congo War, a nine-country coalition formed to remove long-time dictator Mobutu Sese Seko from power. In the aftermath of the First Congo War, the international alliance disbanded, and fifteen months after the end of the first war, they would be fighting against each other in the DRC in the Second Congo War. With the first coalition in tatters, the Second Congo War proved to be a much more complex, bloody, and prolonged affair with even more external and internal actors intervening during the war (Huening 2009). Understanding these two major international conflicts is of paramount importance to the DRC's history, and to explaining how minerals have become such a decisive player in Congolese conflict, with the legacy of conflict minerals plaguing the DRC.

During the First Congo War, international actors began to recognise the resource wealth which was abundant particularly in the east of the DRC. It soon became clear the profitability of these resources and the lack of control exercised on them by Congolese authorities. In many cases mines would be held and change hands between different state and non-state armed groups; and the instability in the region made it easier for parties to generate revenue from the resources. Significantly, while they occupied large swathes of Congolese territory during their invasions, Rwanda and Uganda were able to start extracting Congolese minerals to their own respective capitals and exporting them as their own (Samset 2002). As the business of plundering the DRC's resources became more lucrative, it became ever more coordinated and

organised. To illustrate how effective their strategy was, "the combined diamond exports of Uganda and Rwanda more than doubled from 1998 to 2000, [while] DRC exports were halved" (Samset 2002, 471). This was the case even though Uganda and Rwanda have no diamond deposits within their territory. The exploitation of Congolese resources was so rewarding that war became profitable for the two countries on the DRC's northeastern border and due to the revenue generated by the minerals, military operations in the DRC were almost self-financing.

2.2. The Modern Context

Partly due to the legacy of the aforementioned events, the security situation in the Great Lakes is fragile and dynamic, with alliances and control of territory changing regularly. M23's most recent offensive has been successful in capturing huge portions of the DRC's province of North Kivu, and Rwanda's support for the rebel group has become ever more brazen. Rwandan support for M23 is acknowledged by the UN Group of Experts (UN Security Council 2024) as "systematic", with the same report claiming that Rwandan army officials and intelligence officers are actively commanding the rebel group's activities. Consequently, M23 can be treated as a de facto extension of the Rwandan army, the Rwandan Defence Force (RDF). Rwanda justifies its continued presence pointing to concerns over its own security and the activity of the FDLR (Forces Démocratiques de Libération du Rwanda), a rebel group which consists of Rwandan Hutus with links to the Rwandan genocide and opposing Kagame's regime. The extent to which the FDLR actually pose a credible threat to Rwanda is extremely limited, however, the armed forces of the DRC (FARDC) are often accused of collaborating with them against M23 (Kiyirembera 2025).

Moreover, since FARDC do not have the capacity to enter a direct confrontation with M23 or RDF, they utilise several armed groups as their proxies. However, alliances with these

armed groups can prove unreliable and at times unethical with regards to their respect for human rights and their own illegal exploitation of the DRC's natural resources (Zaamoun 2024). Compounding this, while the EU does not have a military presence in the region, the UN peacekeeping mission MONUSCO still maintains a presence despite its phased withdrawal, and other regional groups including those of the South African Development Community (SADC) and the East African Community (EAC) have both had their own peacekeeping missions until recently contributing to a highly complex military theatre. Simultaneously, Vogel and Musamba (2025) argue that the information warfare and digital propaganda in eastern Congo has become just as complex and important as the physical conflict. Controlling narratives and subsequently public opinion can be of paramount importance for securing both domestic and international support.

The unstable arena and expanding influence of M23 has allowed it to gain key footholds in recent months such as the strategic mining town of Rubaya, estimated to account for around twenty percent of global coltan production. The UN Group of Experts (UN Security Council 2024, 2) subsequently show that "at least 150 tons of coltan were fraudulently exported to Rwanda and mixed with Rwandan production" making it the largest contamination of mineral supply chains in the Great Lakes to date. Access to this kind of mineral source for Rwanda and M23 generates enormous revenues which facilitate their continued operations and administration within DRC's legal territory. Overall, minerals make up roughly 3% of Rwanda's GDP with the country being able to cement itself as a key mineral exporter without significant mineral deposits of its own (Dent 2025).

The product of this situation is growing pressure on actors like the EU to exercise their influence and economic might to end illegal practices and support sustainable solutions. The EU has received significant criticism within the DRC for some of its recent policy decisions in

the Great Lakes, securing resources without taking a meaningful stand against Rwanda and towards peace (Titeca and Kennes 2025a).

3. Literature Review

To conduct this paper's analysis, this chapter must critically engage with three key strands of scholarly analyses, to which its subject material is relevant, and it intends to contribute to. Firstly, this chapter reflects on academic perspectives that demonstrate the centrality of trade in critical raw materials to peace-making in the Great Lakes and subsequently build a picture of the environment in which the EU is operating in the Great Lakes. Secondly, the literature review engages with historical studies of the EU's relationship with the Great Lakes region, seeking to lay the foundations for a historical comparison, and an updating of prior theories by considering contemporary evidence. Finally, this section seeks to frame the EU's actions in the Great Lakes by exploring scholarly analyses that conceptualise how it typically pursues its normative goals.

Throughout past conflicts in the Great Lakes, as international actors and scholars recognised what was taking place, the term 'conflict minerals' emerged to describe those materials which are born out of conflict and facilitate their continuation (Vogel and Raeymaekers 2016). Given the critical significance of these minerals to the EU's trade policy as sustainable raw materials for the energy transition and in their relation to the violence, conflict minerals are central to this paper's analysis. In fact, the concept of conflict minerals is the primary factor of EU-Great Lakes trade interaction and has been throughout recent history. The nature of the minerals that are of interest to European powers might have changed, but the themes remain analogous. While the historical scholarly narratives of the DRC's conflict would emphasise the notion of 'blood diamonds' as the original conflict mineral, more recent research centres on the 3Ts (tantalum (a coltan derivative), tin, and tungsten) and gold as minerals that can finance conflict (Mantz 2008; Vogel and Raeymaekers 2016).

An important idea in the literature on conflict minerals, is David Keen's (1998) conceptualisation that wars can be fought not to win but to serve economic functions through profitable crime. Consequently, ending wars may be against the interests of the actors participating in it. Given the historical background that has been presented, the risk of such a phenomenon is considerable in the Great Lakes region, with such a high profitability in the mining sector and widespread violence. Hence, in an attempt to target this taking effect in the DRC, international players have been called to regulate conflict minerals originating in the Great Lakes and adapt their trade policies so as not to contribute to an environment where war in eastern DRC is profitable. This phenomenon which Keen (1998) observes is key to understanding why trade in conflict minerals in the Great Lakes is inherently linked to violence and peace-making. Therefore, regulations such as Dodd-Frank Section 1502 have come into effect since 2010 as a materialisation of the Conflict Minerals Act, aiming to stop U.S. businesses and the American consumer from purchasing these minerals.

Dodd-Frank Section 1502 introduces legal obligations for US companies to disclose the traceability of their supply chains to verify whether certain minerals originate in the DRC (Vogel and Raeymaekers 2016). Initiatives like Dodd-Frank and the International Tin Supply Chain Initiative (ITSCI), also established in 2010, have successfully raised the profile of the issue of conflict minerals in the DRC, amplifying it on the radar of world leaders and the public alike. It represents a key example of international powers using their position in the global market to address ethical concerns regarding trade and the conflict in the DRC. Subsequently, the implications and the implementation of due diligence initiatives like Dodd-Frank and European alternatives are considered throughout this paper.

However, it is important to raise the significance of critical minerals not just in its contribution to conflict, but also in its centrality to Congolese livelihoods. As Vogel (2022) has argued, Western due diligence initiatives that are implemented without considering the local

context can often have an effect contrary to the desired one. Vogel (2022) observes that by placing such a large emphasis on the traceability of minerals, initiatives like Dodd-Frank can squeeze smaller artisanal miners out of business, creating a dominance of larger producers that can be more corrupt and have adverse effects for local Congolese people. The argument presented by Vogel challenges the traditional understanding of conflict minerals as a direct cause of armed conflict. Moreover, the emphasis which he places on the unintended consequences to local economies in the DRC that Western policies that target conflict minerals can have, is a key consideration when it comes to how the EU carefully balances its trade policies in the Great Lakes region. This is particularly significant when considering the due diligence policies which the EU has supported in the DRC and more recently attempted to implement itself.

To conduct an analysis of how the EU balances its peace-making aims with its strategic trade goals, it is also necessary to understand how the EU aims to use its normative power to position itself as a peace actor. Though the literature on the normative power of the EU is extensive, Ian Manners' (2002) seminal work on how the EU exercises its power is perhaps the most notable. Manners (2002) highlights how the EU frames itself in a distinct way to traditional superpowers, looking to promote its values through its normative influence rather than the military strength of its member states. Importantly for the case of the DRC, it does so by tying trade, humanitarian aid, and international agreements to its values based in human rights and democracy. While Manners (2002) acknowledges that the EU does often act out of self-interest alone, it is argued that comparatively it aspires to act according to its normative values more than traditional powers. Nevertheless, this paper focuses on how the EU uses its normative power in the Great Lakes, and how effectively it does so.

Moreover, Stivachtis et al. (2013) expand on Manners' concept, framing the EU as a 'peace actor' and emphasising the practical actions that the EU takes to manage and prevent

conflicts. According to their analysis, the EU's approach to promoting peace is based on using civilian instruments to foster economic interdependence and promote good governance through conditionality in its trade and aid (Stivachtis et al. 2013). Interestingly, an emphasis is placed on regional integration and encouraging economic interdependence elsewhere, a strategy which it has tried to use in Africa and within the East African Community (EAC) of which both the DRC and Rwanda are members. Crucially, Stivachtis et al. (2013) conclude that the EU is significantly more effective at long-term peacebuilding as opposed to managing active conflicts. Given that the Great Lakes region has been an active conflict zone for almost thirty years now, it is fundamental to consider the EU's limitations. Namely, internal disagreements, slow, bureaucratic decision-making processes, and the lack of hard military power (Stivachtis et al. 2013; Duke 2002) make conflict resolution and management more difficult.

Separately, to frame the detailed and nuanced relationship that the EU has with the Great Lakes region within a historical context, it is necessary to understand previous strategies the EU has used specific to the Great Lakes, and how they have been theorised. Just months before the outbreak of the First Congo War, the European Commission unveiled its conflict prevention strategy for Africa, which was later formalised in the Cotonou Convention (Youngs 2004). This strategy was aimed at addressing the root causes of conflict, including political instability, corruption, and poverty. Consequently, EU states established funds which, among other things, attempted to stimulate inclusive development, while stopping the exploitation of mineral resources for war and increasing security sector accountability (Møller 2001; Youngs 2004). As it has navigated the fragile and dynamic situation in the Great Lakes, the EU has consistently been one of the most proactive international actors. This is the case both regarding humanitarian aid, capacity building, and military operations. For example, Operation Artemis represented the first EU-led military operation independent of NATO, aiming to stabilise towns in eastern DRC (Youngs 2004). These interventions and capacity building exercises illustrate the EU's desire

to be an actor which actively stands for conflict prevention and wants to limit humanitarian crises in the region.

However, in the years following the adoption of a new conflict prevention strategy, Youngs (2004, 320) assessed European policy in the Great Lakes as having "much ambiguity". While it must be recognised that with frequent changes of government and alternating alliances, it was not an easy landscape to navigate, there are three important observations that Youngs makes which this paper analyses with respect to more recent alterations to EU policy vis-à-vis the Great Lakes region. Firstly, Youngs (2004) argues that the various angles the EU uses to approach conflict prevention and resolution, namely political, economic, and military efforts, operated independently, leaving it devoid of a comprehensive strategy (Youngs 2004). This fragmentation weakened the overall effectiveness of the EU's engagement, as actions in one area were not consistently aligned or mutually reinforcing with others acting in a contradictory fashion.

Secondly, driven by the legacy of colonialism, the EU's strategy for Africa has often been shaped by the UK and France, with Belgium also playing a significant role in the DRC (Møller 2001). As Youngs (2004, 312) highlights, these divisions extend even to ethnic groups and governments in the Great Lakes region, with the UK maintaining cautious alignment with Paul Kagame's regime in Rwanda, whereas the French, Belgians, and perhaps the rest of the EU entirely, have had more of a tendency to openly oppose or criticise the Rwandan government. This sentiment has oftentimes been reciprocal, with Rwanda specifically viewing the French government as the "most antithetical" (Youngs 2004, 318) to its own. Given the central role the UK has played historically, and following the events of Brexit, this paper will examine how the EU's positionality towards the conflict has or hasn't been revised by the structural changes within the EU.

Thirdly, Youngs (2004) indicates the hypocrisy of the European policy position by arguing that its rhetoric and actions are not aligned. Specifically, while consistently emphasising the importance of structural reform and hesitance to foster stability through an 'enlightened strong man', in practice the EU's policies empowered elites and did not target the socio-political roots of conflict (Youngs 2004, 320). In part due to its focus on short term solutions and ensuring temporary stability, the EU was criticised for its reliance on local leaders rather than pushing for deeper democratic change (Bourque and Sampson 2001). Trade deals, aid, and diplomatic support alike is framed having been too shortsighted and inconsistent with the overall aim of the EU being to establish sustainable democracies in the Great Lakes region. This is perhaps best shown by the EU's balancing act it played with Kagame following the Rwandan genocide with European institutions and Member States critical of political oppression, but in practice European policy reinforcing his position as de facto dictator. This paper considers the observations made by Youngs in the context of more current policy decisions.

This literature review has established three important conclusions, along the lines of the three objectives which this paper aims to analyse. Firstly, it shows how trade, and in particular trade in conflict minerals, is inherently linked to recurring cycles of violence in the Great Lakes and is therefore crucial to effective peace-making in the region. Secondly, it demonstrates that the EU is not a conventional geopolitical actor, often seeking to promote its normative aims, like peace and democracy, more than other actors and at times above other strategic priorities. Thirdly, it shows how the EU has historically struggled to navigate this nexus between trade and peace-making in the Great Lakes, forming at times desynchronised and inconsistent policy positions.

4. Methodology

To address the multi-faceted question of how effectively the EU has been able to balance its strategic trade goals with its peace-making aims in the Great Lakes region, this paper uses secondary source data, including policy documents, international reports, and academic and field research, performing a comprehensive qualitative analysis of the EU's interactions with Great Lakes countries. Furthermore, this paper focuses on the case study of EU interactions with Rwanda, to aptly illustrate the reconciliation of the EU's trade goals and peace-making aims in relation to arguably the most significant player in the current conflict in the Great Lakes. As is outlined in the literature review, this paper also seeks to perform a historical comparison within the case study, analysing how the EU's positionality in the Great Lakes has developed.

To fulfil its aims, the paper first seeks to understand and explain what the EU's strategic goals are in the Great Lakes region with regards to peace making and trade, by interpreting its leading strategic document, the 2023 'renewed Great Lakes Strategy' (Council of the EU 2023). Then, it explores a range of interactions, establishing a cohesive picture of how the EU navigates the complex environment, and the relationship it has with key players in the region. Given the emphasis placed on trade and subsequently conflict minerals, these are central to the discussion. The interactions which the EU has with Great Lakes countries are split into two broad categories: subsequent trade policies and political interaction with the Great Lakes.

This methodology was chosen for two main reasons along the lines of the functions which this paper serves. Firstly, given the highly complex scenario in the Great Lakes, an analysis of the EU's approach of balancing trade and peace-making aims would not be complete by considering solely how it interacts with Great Lakes countries through trade agreements. The EU actively pursues its economic and normative interests through several means, and it is therefore necessary to consider all those mechanisms individually and as a collective to

construct an argument on how effectively they operate. Secondly, by conducting this thorough analysis, the paper renews and extends existing historical theories of the EU's approach to the Great Lakes region. Subsequently, it addresses the gap in literature which exists, accounting for recent changes and developments to European activity in the region.

5. The EU's 2023 'Renewed Great Lakes Strategy'

In order to pass judgement on the efficacy and overall coherence of the EU's approach to the Great Lakes region, one must first establish what it is intending to achieve. Subsequently, this section will analyse the EU's 'renewed Great Lakes strategy' (Council of the EU 2023), published on 20 February 2023. The strategic document revises the EU's overall approach to the Great Lakes region, with particular emphasis on what the EU is looking to gain from the region with regards to access to trade in raw materials and on how it sees its role as a promoter of peace in the Great Lakes. This analysis will set the benchmark against which this paper will consider the effectiveness of the EU's impact on the ground, and whether its engagement with the Great Lakes is having the desired effect in accordance with its stated aims in the strategy.

5.1. Its Trade Goals

As has been the case historically, concerning the EU's strategic interest in trading with the Great Lakes region, much of it revolves around raw materials. There are several contemporary reasons that make the states of the Great Lakes region and their mineral endowments a particularly attractive and strategic partner for the EU. Firstly, since Russia's launch of its full-scale invasion of Ukraine in 2022, and amid rising global trade tensions, the EU has scrambled to secure alternative sources of raw materials, and more generally looked to diversify its supply chain (Świstak 2024). With the wealth of natural resources that central Africa has to offer, it presents an enticing opportunity to fulfil that diversification. Secondly, the type of raw materials is particularly significant given the EU's green agenda. Namely, its Global Gateway initiative, a key priority of Ursula von der Leyen's first Commission, working to scale up cooperation on fighting climate change and establish sustainable supply chains. More specifically, under its Global Gateway initiative, the EU has a strategic goal to engage and invest more in bolstering connections with African partners (European Commission

2025a). The abundance of critical minerals for the energy transition in the Great Lakes region makes it an ideal partner with those policies in mind. Thirdly, and linked to the rising global trade tensions, China's presence in Africa has been growing during the last decade (Murphy 2022), and China has become a dominant player in the Great Lakes' raw materials economy (van Wieringen 2024). Therefore, the region has become a key battleground for the EU to confront a systemic geopolitical rival in China (EEAS 2023).

In order to structure, and formally establish, its intentions to pursue critical minerals and stronger trade relations in the Great Lakes for all the reasons laid out, the EU published its 'renewed EU Great Lakes Strategy' (Council of the EU 2023). With partnership in mind, it sets out the 'key emphasis to be placed on sustainable resource management' and 'actively encouraging' the Great Lakes mineral economy to transition to a "legitimate commerce-based economy" (Council of the EU 2023, 10). As it outlined in the document, the EU's intention here is to nurture the formation of a more reliable and less corrupt mining sector within the Great Lakes region, which it can then invest in, both fulfilling its trade goals and supporting the livelihoods of local communities. Moreover, the commitment to continue financially supporting mutually beneficial partnerships (Council of the EU 2023, 10) shows this intention to further a symbiotic relationship, unlocking the potential of countries from the Great Lakes region as a trade partner.

Furthermore, within the renewed EU Great Lakes Strategy, many elements of Stivachtis et al.'s (2013) analysis can be found. Namely, economic interdependence and trade between Great Lakes states plays a major role, and it is clear the EU's intention to encourage the idea of regional integration as an agent for peace. In this way, the strategy contains a marked emphasis on promoting regional integration and its support for regional bodies such as the EAC or the SADC (Council of the EU 2023, 12), which is significant and shows the EU's persistent championing of regional organisations which mirror the EU itself. This tendency is significant

in describing the way the EU promotes its normative values through trade, encouraging its own common market style model to be implemented in other parts of the world, and then viewing those established regional bodies as apt trade partners.

5.2. Its Peace-making Aims

Simultaneously, the peace-making aims within the 2023 renewed EU Great Lakes strategy are also evident. In line with the conceptual frameworks of both Manners (2002) and Stivachtis et al. (2013), it can be observed within the strategy that the EU as a distinct actor is more concerned with the promotion of its values and human rights than typical geopolitical forces are. Consequently, it endeavours to limit morally controversial activity so that it is not complicit with what it considers to be ethical breaches during its pursuit of increasing trade in critical minerals. In that way, its approach to establishing a trade partnership with the Great Lakes region has some nuance to it. Subsequently, the publication of the renewed Great Lakes strategy seeks to confront the evolving situation in light of the M23 offensive which began in March 2022, eleven months before the renewed Great Lakes strategy was launched. In contrast to the trade goals already analysed, much of the strategic document is addressed at the complex security and humanitarian situation in eastern DRC, outlining how the EU plans to support regional peace processes and other international efforts. In fact, described in the strategy as the overarching EU objective and priority is the desire to "help end armed conflict and promote peace" (Council of the EU 2023, 5).

While the strategy's mentioning of European strategic trade goals in the Great Lakes is significant, undoubtedly its primary focus is diplomatic, and exploring how the EU will 'sustain its commitment to breaking the cycle of violence' (Council of the EU 2023, 5). To illustrate this, the word peace is referred to twenty-one times in the strategy paper, more than any references to trade or economic objectives (Council of the EU 2023). This frequency reflects

not only rhetorical emphasis but also the EU's conviction that peace and economic prosperity are interdependent. Within the strategy, the EU identifies numerous factors as key drivers of regional armed conflict, and barriers to peace-making efforts. These include: poor governance; corruption; illicit mineral trafficking; misinformation and hate speech; and the proliferation of armed groups in eastern DRC by foreign and regional actors. Significantly, the EU commits within the renewed Great Lakes strategy to tackling these causes of violence. Furthermore, the European Parliament Research Service (2023, 48) stresses that the Commission's renewed Great Lakes strategy strengthens engagement with peace efforts, framing peace as a sort of prerequisite for furthering trade engagement.

Another important aspect of the EU's peace-making aims stated in the renewed Great Lakes strategy is the attention paid to ensuring territorial integrity. One of the so-called guiding principles of the strategy is to "promote the respect of territorial integrity [and] sovereignty" (Council of the EU 2023, 4). By this, it is safe to infer that the EU is referring to territorial breaches by armed groups and Rwandan military in the eastern DRC. Subsequently, guaranteeing that it does not contribute to any Rwandan, or Rwandan-supported, occupation of the eastern DRC should be central to all of its engagement with the region.

5.3. The Strategy's Fine Balance

Reconciling the pre-stated trade goals and peace-making aims is not an easy task, but the renewed Great Lakes strategy aims to navigate this tricky dilemma. The subheadings of the strategy itself demonstrate the transformation which the EU is delicately seeking to stimulate: "From Tensions to Trust, Security and Stability; From Trafficking to Trade and Sustainable Development; From Competition to Cooperation and Integration" (Council of the EU 2023). The EU understands that establishing trade partnerships with Great Lakes states comes at a risk

of exacerbating tensions and violence, while also recognising its own need for resources and the need of local African workers to receive income for their own livelihoods.

However, the EU places significant emphasis on its normative peace-making values in the renewed Great Lakes strategy, and the establishment of them as "[G]uiding [P]rinciples" (Council of the EU 2023, 4) and "[P]rinciple... [O]bjectives" (Council of the EU 2023, 5). Hence, it is concluded that the strategy seeks to elevate the value of its peace-making aims, considering peace as a strategic enabler for further EU economic engagement in the region. To support this claim, the renewed Great Lakes strategy's publication primarily coincides with growing concerns to do with violence in the Great Lakes, not increasing trade goals. Indeed, within the document the evolving situation with regards to security is regarded as that which sparked the need for renewed strategic engagement (Council of the EU 2023, 5).

Above all, the adoption of a comprehensive and coherent strategy placing peace at the centre of the EU's activity in the region, would seem to indicate an attempt to correct a strategy that had been criticised for its hypocrisy in light of security developments (Youngs 2004). Moreover, the strategy underscores a commitment to deliver "concrete and measurable results" (Council of the EU 2023, 13). Particularly with an emphasis on long-term peace, "the security, stability and prosperity of the countries of the Great Lakes region remain a strategic priority for the EU" (Council of the EU 2023, 4). Therefore, with this document as the blueprint for European engagement with the Great Lakes region, it should be the case that the EU has since adopted a cautious approach, which places peace-making aims at the centre of all interactions.

6. Detailed Trade Policies

In this chapter, agreements and statements of intention regarding trade between the EU and key Great Lakes states since March 2022 are the subject of analysis. With the 2023 renewed Great Lakes strategy in mind, it is explored how the EU has sought to interact with individual states, with a particular focus on Rwanda, through trade discussions and the negotiation of trade partnership agreements. Additionally, this section will consider the effect of more specific trade policies, namely due diligence initiatives, and whether the effects of those policies is delivering the desired outcomes as stated in the Great Lakes strategy.

6.1. Trade Agreements

6.1.1. Memoranda of Understanding

Pursuant to the renewed Great Lakes strategy, the EU has concurrently pursued individual partnerships with countries in the region. Most significantly, the DRC, Zambia, and Rwanda. These efforts have manifested themselves as memoranda of understanding (MoUs), non-binding frameworks which outline intentions to deepen trade cooperation and work towards concrete agreements. While in practice, a memorandum of understanding is not a legally binding trade agreement and does not offer substantial commitments or investments, it does reveal the EU's positioning regarding its trade goals and other considerations in certain circumstances.

The MoUs established on 25 October 2023 with the DRC and Zambia cover five named areas for cooperation: 'infrastructure investments; collaboration on research and innovation; the integration of raw materials value chains; cooperation to build sustainable production practices; and building capacity for the enforcement of relevant rules" (European Commission 2023). All of these areas for cooperation fall under the overarching aim of collaboration on sustainable raw materials (European Commission 2023), demonstrating the dominance of these

minerals in the formation of the EU's trade policy in the Great Lakes. The latter three points in particular demonstrate the overwhelming emphasis the EU has placed on establishing a strong and legitimate sustainable raw mineral market which it can then gain European access to (Neema 2024). This guarantees European diversification of its supply chains while increasing trade prospects and local employment opportunities for the states in question. Illustrating this further, is the specific mention within the MoU of the Lobito Corridor, which connects the DRC and Zambia in a resource rich area. The EU committed to invest financially and technically to the development of transportation networks in that area (European Commission 2023), with a view of boosting legitimate trade in southern DRC and then being able to benefit accordingly.

After being initially well received, the EU's MoU with the DRC has since yielded a concrete roadmap for a strategic trade partnership between the two countries (European Commission 2024a). The roadmap further outlines long-term trade ambitions, and investments in mining projects, while considering the EU's normative values and placing human rights and rule of law at the centre. As such, from the humanitarian side, the recent high-level trading relationship between the EU and the DRC is a good example of Europe's attempt to condition trade incentives on the implementation of good governance and other standards. Moreover, while devoid of any reference to China, these agreements are a definite response to China's presence in the Great Lakes (Świstak 2024). Chinese companies own fifteen of the nineteen copper-cobalt mines in the DRC and Zambia (van Wieringen 2024), exercising control over one of the largest global sources of critical minerals. Consequently, it is evident that a geopolitical aim of the EU in its MoUs with DRC and Zambia is establishing a presence in the region to rival China's dominance of raw materials. Since the signing of the MoU, it has been reported that EU businesses and diplomats have materially increased their engagement with the extractive sectors of the DRC and Zambia by attending events and conventions, with over forty European companies attending the 2024 DRC Mining Week (Lukusa 2024). This shows that in practice, the MoUs with the DRC and Zambia have been positive for European engagement in the region, and sources allege that the EU intends to further its cooperation with Congolese partners and authorities (Lukusa 2024).

6.1.2. EU-Rwanda MoU

The EU's MoU with Rwanda is a much greater source of controversy, generating much criticism both within the EU and outside it. It was signed in February 2024, five months after the previously mentioned two, and it sought to achieve many of the same goals, this time in Rwanda (European Commission 2024b). This statement of intention also consists of five points which are almost identical to those with the DRC and Zambia (European Commission 2024b), proclaiming EU intentions to invest in Rwandan mineral infrastructure to support their natural resource industries, and secure European access to Rwandan exports.

Importantly, given the links between Rwanda and smuggling of minerals out of the DRC, the MoU does contain provisions to better enforce due diligence and traceability measures. It lays out a pathway to cooperation on "increased due diligence and traceability [measures], cooperation in fighting against illegal trafficking of raw materials and alignment with international Environmental, Social and Governance (ESG) standards" (European Commission 2024b). These declarations seek to protect the integrity of Rwandan mineral supply chains, to allow them to be free of conflict minerals and fit for European consumption, in line with the renewed Great Lakes strategy.

6.1.3. Criticisms of the EU-Rwanda MoU

Given the widespread links between Rwandan authorities and natural resource smuggling in the DRC, it is clear why this declaration was controversial and met with discontent. Upon the signing of the agreement, the DRC's President Félix Tshisekedi denounced the deal as "a provocation in very bad taste" (Zimmermann 2024). With abundant evidence from the U.S.

Department of State (2024) and the UN Group of Experts (UN Security Council 2024) that the Rwandan government is at best complicit in trafficking operations of minerals out of the DRC, it has been questioned how the EU can justify its engagement and usage of Rwandan mineral supply chains. For example, the US State Department (2024) confirmed that Rwandan exports of minerals like coltan are higher than their own domestic production through mining, meaning that a significant quantity of Rwandan resources are smuggled from the DRC conflict zones. Within the DRC it has been dubbed a 'blood minerals deal' (Titeca 2024), reminiscent of the blood diamonds which plagued historical conflict in the Congo. From the DRC's perspective, the MoU situates the EU as a facilitator of Rwanda's profiting from Congolese resources. In fact, the executive director of African Natural Resources Watch, Emmanuel Umpula Nkumba, remarked that the deal shows the EU values its need for raw materials over its human rights principles (Zimmermann 2024).

Since the signing of the deal, M23 expansion to control both the Rubaya mines and now Goma has led to ever increasing concern and opposition to the MoU, notably within the EU. Within the European Parliament, references have been made to President Tshisekedi's criticisms, and MEP's have asked whether the EU should be risking the integrity of its supply chains and engaging with the illicit mineral trade (European Parliament 2024). While the Commission insists the deal will help to leverage change on the ground (Zimmermann 2024), external pressures pushed it to place the MoU under review as of early 2025, as tensions in eastern Congo have escalated (Apelblat 2025). Moreover, since the announcement, human rights NGO and watchdog Global Witness have reported that an EU-based company bought 280 tonnes of coltan from Rwanda which can be traced to the Rubaya mining sites in M23-controlled DRC territory (Matijevic and Kopp 2025). According to their findings, the Luxembourg-based company will have directly contributed to M23's activity by paying a 15% tax which the armed group has placed on minerals trafficked to Rwanda (Matijevic and Kopp

2025). Reports of this kind have prompted further outrage and criticism with calls for the EU to suspend or withdraw from the MoU entirely.

The fact that the MoU with Rwanda has not yet been suspended would indicate at least some tolerance of the possibility that the integrity of European supply chains be breached by conflict minerals, which Matijevic and Kopp's (2025) Global Witness report highlights is happening. In this empirical case, at least one European company does appear to be complicit in the illegal exploitation of minerals and subsequently is linked to the cycle of violence in the DRC (Matijevic and Kopp 2025). When contrasting that to the stated ambitions of the EU in its 2023 renewed Great Lakes strategy, for example, not to participate in an illegitimate smuggling-based economy, it quite clearly contradicts the commitments to deliver measurable results on the ground. This critique of the EU is synonymous with one of the observations Youngs (2004) made twenty years prior: that the rhetoric of the EU is detached from its material effect on the ground in the Great Lakes.

6.2. EU-Great Lakes Due Diligence Initiatives

Looking beyond trade partnerships and MoUs, the EU has also engaged in trade specific activity in the Great Lakes region by way of supporting international, and implementing its own, due diligence initiatives. In attempts to ensure the integrity of supply chains and avoid the proliferation of conflict minerals, several global actors have implemented due diligence initiatives for companies operating in mainstream markets. In this section, the paper will analyse due diligence initiatives overall, aiming to understand the challenges they face in the Great Lakes context. Then, it will explore the initiatives which the EU has imposed on companies operating in the Great Lakes region, demonstrating an attempt that the EU has made to improve the quality and morality of its trade, further to its broader trade agreements and intentions.

Before the scope of this paper, the EU passed a 'Conflict Minerals Regulation' (CMR) in 2017, which came into effect in 2021, and is comparable to the previously mentioned Dodd-Frank Section 1502 and the Organisation for Economic Cooperation and Development (OECD) Due Diligence Guidance for conflict minerals (Source Intelligence 2024). Since then, and after the publication of the 2023 renewed Great Lakes Strategy, the EU has formally adopted its Corporate Sustainability Due Diligence Directive (CSDDD) building on the CMR to some degree and, among various other objectives that are not specific to this study, intends to influence mining in the Great Lakes. The core premise of all due diligence efforts in the Great Lakes is to mandate businesses to pay closer attention to their supply chains and the origins of the materials that make up their products. Most of these initiatives are focused on the 'upstream' of the supply chain, improving due diligence and traceability at mining sites to establish the conflict-free origin of minerals (Taka 2014).

However, as has been emphasised throughout this paper, the insecurity in eastern DRC makes it difficult to establish control over materials, let alone trace their origins. This is well illustrated by the US Government Accountability Office (GAO) report (GAO 2023), which highlights how since Dodd-Frank Section 1502, US companies reporting on their due diligence have been more likely than not to be unable to determine the source of their materials. In fact, a subsequent report from the GAO (2024, 2) found that conflict minerals disclosure rules has "not reduced violence in the ... DRC and has likely had no effect in adjoining countries". In 2013, De Ridder at al. (2013, 10) concluded that low governance capacity in the mining sector, high compliance costs, and endemic corruption are key obstacles to implementing effective mining due diligence in the DRC. The barriers observed by De Ridder et al. (2013) to functional due diligence have persisted in the Great Lakes (Aula 2020), and continue to hinder their implementation.

Furthermore, as was highlighted in the literature review, recent reconceptualisations of due diligence initiatives have raised concerns about counterproductive effects of due diligence initiatives in the Great Lakes, damaging local livelihoods. They do so because due diligence is often disproportionately difficult to conduct for small and medium-sized enterprises, leading to mining monopolies which drive down the income small scale miners receive (Bikubanya et al. 2023; Vogel and Raeymaekers 2016). Moreover, it can decrease the willingness of companies to do business with the Great Lakes region altogether, by creating high administrative costs that act as barriers.

The background information on due diligence demonstrates the fine balance which the EU has to navigate in the Great Lakes and epitomises the difficulty of establishing coherent and effective trade policy. Hence, in light of the above, the EU has sought to incorporate the most recent evidence in its newest attempt at due diligence reform, the CSDDD. Like Dodd-Frank, the main due diligence obligations under the CSDDD are "obligations of means", not "obligations of result" (Connellan et al. 2024). This means that companies are only mandated to provide reporting on their supply chains, not to interfere with them or change the end-result in any way. In this way, companies importing to the EU are expected to carry out effective due diligence and reporting on both upstream and downstream activities, but there is an acceptance that there may be irregularities in the supply chain, limiting the effect it can have. Furthermore, like Dodd-Frank, only the importer is required to do due diligence, not end-user companies (Bikubanya et al. 2023). However, Dodd-Frank's implementation meant that companies sourcing minerals from the Great Lakes would directly incur extra costs on due diligence compared to if they were to import from other places. Meanwhile, the CSDDD seeks not to disincentivize companies from operating in the region (Theeuwes et al. 2023), showing the EU's commitment not to damage Congolese livelihoods altogether.

While the implementation of the CSDDD shows the EU's intention to continue with due diligence regulation after the CMR, it is fair to say that it does "not constitute something completely new or revolutionary" (Thorens et al. 2025, 615). While the EU has clearly attempted to protect Congolese small-scale miners from the adverse effects that Vogel (2022) has observed, the CSDDD in essence is very similar to existing initiatives. As this paper has demonstrated, due diligence frameworks in the Great Lakes often struggle to generate substantive effects (GAO 2024). It has been argued that they can be weak and unenforceable, and the risk of illegal minerals being mixed and blended with legitimate batches is considerable (U.S. Department of State 2024). While it is argued by this paper and others that the CSDDD could prove to be a step in the right direction for due diligence initiatives (McCullagh 2024), its limitations, and the limitations of due diligence initiatives as a whole, must be acknowledged.

Given the scale of the task that is tracing minerals that originate in the Great Lakes region, the CSDDD cannot be expected to establish effective and extensive safeguards for imports coming from Rwanda in the current scenario. However, in the meantime, while the EU attempts to establish those safeguards, it would appear to be seeking to increase the imports of high-risk Rwandan raw minerals and entering into a closer partnership with Rwanda as per the MoU. It is argued that this contradicts the EU's aims to ensure the integrity of its supply chain. Furthermore, while the Commission Foreign Representative, Kaja Kallas, placed the EU-Rwanda MoU under review in February 2025 (Jones 2025), the absence of a tangible outcome or transparent review process at the time of writing demonstrates the limitations of the EU when working with dynamic circumstances like this one. This would support observations by Stivachtis et al. (2013) and Duke (2002), that the slow and bureaucratic essence of the EU restrict its ability to be an efficient peacemaker during active conflicts. This claim is also backed up by the extensive period of time which the EU has taken to implement its due diligence

initiatives, with both the CMR and the CSDDD taking over two years to enter into force. Consequently, due to its lack of dynamism, it is argued that the EU's diplomatic power and economic strength is suited to conflict prevention and not conflict management, limiting its impact in active conflicts like the one in the Great Lakes.

7. Political Interaction with the Great Lakes

The following section of this paper analyses more broad, political interactions between the EU and the Great Lakes region, which are not necessarily specific to trade, but have a significant bearing on the overall coherence of the EU's strategy in the region. As the 2023 renewed Great Lakes strategy details, the promotion of peace in the region should be central to the EU's interactions with the Great Lakes. By primarily focusing on the case study of Rwanda, this section will illustrate how the EU fails to adopt a consistent approach which is aligned to its own strategy. Additionally, the nature of the following interactions demonstrate the inconsistency of the EU's MoU and pursuit of strategic raw minerals in Rwanda, while it condemns Rwanda on various other issues.

7.1. EU Sanctions

To quote the European Parliament Research Service (2023, 11), "sanctions are an important part of the EU foreign policy toolbox". They allow the EU to respond to crises, seeking to support conflict resolution efforts, and influence actors it considers to be participating in or actively engaging in the violation of human rights (EEAS 2025). As such, the recent surge of violence in the eastern DRC has led several batches of new sanctions on individuals and entities in the Great Lakes region. The EU's list of sanctions on individuals operating within the DRC is long, given the plethora of active armed groups and human rights concerns regarding Congolese mining businesses.

However, what is most relevant to this paper's discussion, are the recent sanctions that have been placed on Rwandan individuals and entities for their actions in the DRC. The first Rwandan to be sanctioned after March 2022 was Jean Pierre Niragire, a commander of the RDF's special forces unit, deemed by the EU to be active in the Congolese province of North Kivu (European Commission 2025b). Since then, four other high-ranking officers of the RDF

have become subject to European sanctions for "sustaining the armed conflict, instability and insecurity in the DRC" (Council of the EU 2025a). Most recently, in March 2025, the EU sanctioned the CEO of the Rwanda Mines, Petroleum and Gas Board, a government body which regulates mineral exploitation in Rwanda for his responsibility in exploiting "the armed conflict through the illicit exploitation and trade of natural resources" (Council of the EU 2025a). Moreover, the Gasabo Gold Refinery, one of Rwanda's main refining facilities was also hit by sanctions, after the EU described it as "a transit point for gold mined illegally in the DRC" (Gahigi 2025).

These sanctions indicate European acknowledgement that Rwandan individuals, and government operatives are active in illegal activity in the DRC. That is the case both militarily, and within the Rwandan mineral industry which is overseen by Kagame's government. The sanctions imposed by European authorities would appear to be in line with the renewed Great Lakes strategy. Specifically, the emphasis on protecting territorial integrity, and discouraging illicit practices in the mineral trade, are fulfilled by the EU's willingness to sanction parties it sees as complicit in such activity. On the other hand, the EU can be criticised for its lack of consistency, as it now sanctions a trade which it in part facilitated by trading with Rwanda and signing the MoU a year before the sanctions (Gahigi 2025). It would seem most contradictory for the EU to sanction the individual responsible for Rwanda Mines, while its MoU with Rwanda remains active and aiming to facilitate closer trade on minerals that Rwanda Mines exports. The discussion on sanctions is of paramount importance, as research suggests US and European sanctions are one of the main factors which curb "M23's advance and dampen... Rwanda's assertiveness" (Handy 2025). Subsequently, it is important to ensure that sanctions are having the greatest effect possible, which may not be the case when they are seemingly working in contradiction to the activity which the EU pursues on the trade front.

7.2. Military Aid

Another pertinent interaction which the EU has with Rwanda, is its providing of military aid to Rwandan peacekeepers in the Cabo Delgado province of Mozambique. It is now examined how this military aid adds to the inconsistent approach that the EU has towards Rwanda, and the incomplete promotion of peace-making aims.

Since 2019, the Cabo Delgado province of has been subject to an expansion of the Islamic State in Central Africa Province, and the Mozambican government appealed for support to combat the insurgency (Čáslavová 2022). Having answered the call in July 2021, Rwandan peacekeepers have since been active in Mozambique. In the period which this paper analyses, the EU has twice offered, under the European Peace Facility (EPF), financial support amounting to €20 million to facilitate these Rwandan military operations (Council of the EU 2024a). The second, and most recent instalment of military aid was provided in November 2024, after a drawn-out review of the aid, with reservations from several Member States including the Netherlands, Belgium, Germany, and Sweden (Africa Intelligence 2024).

The source of controversy and inconsistency here is that by supporting the RDF in Mozambique, the EU is funding an institution while simultaneously condemning and placing sanctions on select leaders of that institution. While the military aid provided to peacekeepers in Cabo Delgado might be a separate operation to that which is taking place in the DRC, any financial contribution to the RDF does raise questions as to the coherence of the EU's stance. It is highly problematic to lend support to a military which the EU itself has acknowledged is breaching the territorial integrity of the DRC when it announced its sanctions (Council of the EU 2025a). While the operations are taking place in different locations, providing financial aid to an institution that the EU openly has criticised for its actions in the DRC is questionable. To contrast this to the stated aims of the EU within the renewed Great Lakes strategy, where there

is a tremendous emphasis placed on territorial integrity, the actions of the EU are not entirely aligned. Given the extensive nature of considerations on whether to renew military support to Rwanda in the latter half of 2024, it is surprising that the Commission decided on an action which is in part contradictory to the guiding principles of the Great Lakes strategy, by empowering the RDF.

Moreover, it has been alleged by various sources (Titeca and Kennes 2025b; Titeca 2024; Lepidi 2023) that the underlying reason for the military aid is to protect the interests of French businesses, namely, the gas company TotalEnergies. TotalEnergies had been forced to halt its €20 billion liquified natural gas (LNG) project due to the insecurity created by Islamic State, and as such "France figures as the main world power interested in the rapid re-establishment of security in Cabo Delgado to allow the resumption of the Mozambique LNG gas project" (Beúla and Sinoia 2021, 4). As a consequence, it is reported that France led the charge both in its national capacity and within the EU to scale up military assistance in Mozambique and grant funding to Rwandan peacekeepers (Titeca and Kennes 2025b; Snopko 2024). Given the historical hesitancy of France to support Rwanda, pointed out by Youngs (2004), this is a marked shift in their approach, arguably fuelled by guaranteeing its national interests. If this narrative is taken to be true, the military action of the EU in Mozambique via the RDF would add to the claim that national economic interests, in this case French ones, are often valued higher by the EU than its human rights principles (Zimmermann 2024), something the Great Lakes strategy would seek to avoid. In sum, the renewal of military aid to Rwanda, in a climate where its military involvement in the DRC is so brazen, somewhat undermines the legitimacy of the EU as a peace-making actor in Central Africa, sending an inconsistent message to Rwandan authorities (European Parliament 2025).

7.3. A New EU Special Representative

In part due to the controversy caused by some of the contradictory actions of the EU in the Great Lakes region that have already been discussed, civil society in the DRC and seventeen European based human rights organisations issued an open letter in March 2024 calling for the Commission to appoint an EU Special Representative (EUSR) to the Great Lakes region (Relief Web 2024). In the letter, the signatories highlighted inconsistencies in the foreign policy of the EU, along the lines of what has been discussed in this paper and called for the EU to reaffirm its renewed Great Lakes strategy (Relief Web 2024). Directly referencing trade policy and the EU-Rwanda MoU (Relief Web 2024), the open letter questions the sincerity of the EU's commitment to peace, demanding a point man who can coordinate European interactions in the Great Lakes and reinstate the legitimacy of the EU in the region.

In response, on 1 September 2024, the EU appointed Johan Borgstam, a Swedish diplomat assigned to the Great Lakes region, opening up a new channel for diplomatic action and strategic engagement. In the announcement of his appointment, it is affirmed that his mandate is directly linked to the implementation of the 2023 renewed Great Lakes strategy, aiming to formulate a more comprehensive approach (Council of the EU 2024b). This appointment yet again suggests that the EU itself is at least somewhat unsatisfied with its lack of consistent or coherent approach, attempting to correct its shortcomings. Nevertheless, it displays a willingness to address inconsistencies, and to refocus on the top strategic priorities of the renewed Great Lakes strategy, and the promotion of peace.

On 16 May 2025, the Council of the EU (2025) renewed the mandate of the EUSR for another two years until 2027. As such, it remains a work in progress, with Borgstam conducting state visits to international peace-making partners including the African Union, the DRC, and Rwanda. The extent to which an EUSR is able to streamline the EU's approach in the Great

Lakes is not clear yet, but the renewal of military support to Rwanda, for example, which took place after his appointment, suggests work is still to be done to ensure the EU's approach stays consistent with its pre-stated goals.

Furthermore, it is worth noting that the process of appointing an EUSR was not without difficulty. EU Member States had reportedly agreed on a Belgian diplomat who was a leading candidate to be appointed EUSR, before Rwanda expressed its concerns over the impartiality of that diplomat, causing the EU to U-turn and select Borgstam (IGIHE 2024; The Brussels Times 2024). Despite all parties denying Rwandan interference in the selection process, and no concrete evidence suggesting they did, it is probable that Rwanda's influence had something to do with the appointment of Borgstam, further disenchanting Congolese civil society actors (Africa Intelligence 2024). Though none of this is particularly surprising given the need for any EUSR to engage effectively with Rwanda, it does go to show the delicate balancing act which Europe has been playing with Kagame's government since Youngs' (2004) observations is still present today to an extent.

7.4. European Parliament Statements

As has been evident throughout all of the interactions that have been analysed to this point, the European Parliament is usually the European institution most critical of the EU's overall approach. At various stages, the Members of the European Parliament (MEPs) have questioned the consistency and coherence of the EU's approach to the Great Lakes and called on the Commission to act and align its actions closer with the renewed Great Lakes strategy. In fact, arguments from the European Parliament have been some of the strongest in addressing the failures of the EU's foreign policy to effectively balance trade goals and peace-making aims. The most potent example of this tendency is the joint motion for a resolution which MEPs from almost all political groupings filed on 11 February 2025. The resolution was introduced

and adopted in the aftermath of the M23 taking the city of Goma in January 2025 and addresses the cyclical violence and the desire for Europe to play a role as peacemaker and reconsider its strategic trade engagement with Rwanda.

The joint resolution strongly critiques the Commission's actions regretting "that the EU has not taken appropriate measures to sufficiently address the crisis and effectively press Rwanda to end its support for M23" (European Parliament 2025). Namely, the MoU with Rwanda, and the extension of military support to the RDF in Mozambique are criticised and the resolution urges the Commission to suspend both (European Parliament 2025). Most poignantly, the resolution which was adopted by an overwhelming majority of MEPs, "[e]xpresses concern over the lack of coherence in the EU response to the Great Lakes region's crises and calls on the Council to reassess the implementation of its renewed EU Great Lakes strategy" (European Parliament 2025). The European Parliament has observed the same inconsistencies that have been raised throughout this paper, calling for re-alignment with the renewed Great Lakes strategy, a document whose mandate would have the support of MEPs.

8. Conclusion

The EU's current struggles to establish responsible trade agreements and an effective, coherent approach in the Great Lakes show the desynchronised nature of the EU's approach which Youngs (2004) observed twenty years prior. While politically, its overarching strategic document, and its elected parliament remain steadfast in their commitment to peace promotion and supply chain integrity, its economic approach is not entirely aligned. Given the persistence of the EU-Rwanda MoU, economically it appears that the demand for conflict minerals supersedes the political concerns about their origins, and securing businesses interests takes precedence over establishing clear and effective sanctions. This highlights the need to integrate the EU's approach more effectively to remove ambiguity from its policy approach and deliver the concrete and measurable results it refers to (Council of the EU 2023, 13) without indirectly financing violence in eastern DRC. It could be argued that with many aspects of its approach under review, not enough time has passed for a judgement to be cast on the Commission's approach. However, this only demonstrates the point which Stivachtis et al. (2013) and Duke (2002) emphasise, that the EU struggles to be an effective peacemaker during active conflicts due its lack of dynamism, a product of bureaucracy and slow decision-making processes in a situation which requires quick and decisive actions to have the greatest effect. Meanwhile, it is clear that the same European policymakers are aware of emerging research like that of Vogel (2022) as its most recent due diligence legislation is modelled on minimising the negative impact on Congolese livelihoods that has been highlighted as a concern.

In conclusion, by analysing the case study of EU interactions with Rwanda and holding the EU accountable to its own 2023 renewed Great Lakes strategy, this paper has shown the shortcomings of the EU's approach to the Great Lakes region of Africa. It is argued that while the EU repeatedly emphasises its normative peace-making aims, especially within the 2023

strategy, its actions do not entirely align with that which it has stated. This paper sides with the European Parliament (2025) joint resolution, which highlights the need for the EU to suspend several parts of its engagement with Rwanda, for example the EU-Rwanda MoU, if it truly seeks to effectively promote peace rather than prioritising strategic trade goals.

Moreover, through historical comparison, this paper has shown that many of the issues of consistency in the EU's approach to the Great Lakes that were observed by Youngs (2004) twenty years prior, persist today. Namely, the misalignment of the EU's rhetoric and actions and the desynchronised and fragmented nature of its approach. By re-establishing the observations of Youngs (2004), this paper has demonstrated that the EU continues to struggle to exercise its will of being an active and effective peace-maker in the Great Lakes in part due to the rapidly changing nature of the conflict and the lack of dynamism of the EU's response to it.

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