



Restrictive Measures and Zimbabwe: Political Implications, Economic Impact and a Way Forward

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Executive Summary

The situation in Zimbabwe has changed since restrictive measures by many Western countries came into effect in the early 2000s. The signing of the Global Political Agreement (GPA) opened a new chapter for Zimbabwe. As such, it is imperative that a review of restrictive measures take place to determine their relevance in seeking political and economic reforms, to assess their impact, and to consider the potential consequences of continuing the current scheme, a temporary lift or an unconditional removal of the measures.

The signing of the GPA and the formation of the Government of National Unity (GNU) prevented Zimbabwe from continuing to spiral out of control and helped to establish a measure of political and economic stability. However, major concerns remain, given the intransigence of the Zimbabwe African National Union-Patriotic Front (Zanu-PF) specifically over honouring its responsibilities outlined in the GPA. Thus far, its unwillingness to halt violent land occupations and continued control of certain key aspects of the economy and security sectors are signs that the party's obstinacy could hinder substantive progress.

Zimbabwe has been most affected by restrictions imposed by International Financial Institutions (IFIs) and from a marked decrease in Official Development Aid (ODA) entering the country. Additionally, the restrictive measures currently in place have been undermined by the lack of coordination among the West, members of the Southern African Development Community (SADC), particularly South Africa, and the internal Zimbabwean parties. Sanctions busting by other members of the international community, namely China, has further undermined the restrictive measures as an instrument for change in this situation.

Since the signing of the GPA, South Africa has attempted to find a common position with the international community but has consistently stated that sanctions targeted at one half of the GNU engender internal divisions and have complicated problem-solving since members of the unity government are subject to different standards.

The international community has three options: maintain the status quo, completely lift restrictive measures, and the calibrated lifting of restrictive measures tied to six benchmarks.

Zanu-PF has successfully framed the restrictive measures debate within the context of Western neo-colonialism and imperialism. Maintaining the status quo would thus do little to encourage further concessions from Zanu-PF or achieve further gains within the GPA. This option is likely to prolong the stalemate between Zanu-PF, the Movement for Democratic Change - Mutambara (MDC-M) and the Movement for Democratic Change - Tsvangirai (MDC-T). Similarly, removing restrictive measures would be premature. Even if restrictive measures are completely lifted, it is unlikely that international donors would embark on significant re-engagement in the country.

The one point on which broad consensus may be possible is the calibrated lifting of restrictive measures tied to six benchmarks: a credible voters' roll, an independent electoral commission, media freedom, a constitutional reform process, a land audit and security sector reform, all in cooperation with the SADC. Within the SADC, South Africa is the rational choice to head the initiative because of its own experience of political transition, its economic and political weight in Africa and its membership in the SADC, the African Union (AU) and the Commonwealth.

Research Question

The situation in Zimbabwe has changed since restrictive measures by many Western countries came into effect in the early 2000s. The signing of the GPA opened a new chapter for Zimbabwe. As such, it is imperative that a review of restrictive measures takes place to determine their relevance in achieving political and economic reforms, to assess their impact, and to consider the potential consequences of continuing the current scheme, or enacting a temporary lift or removal of the measures. This study shall address each of these issues.

Background

The defeat of the Zanu-PF constitution in the 2000 referendum, noteworthy for its consolidation of presidential powers and for allowing the government to confiscate white-owned land for redistribution to blacks without compensation, unleashed a wave of deadly political violence. This unprecedented defeat was a clear rejection of Zanu-PF's policies by the electorate. As a result, President Robert Mugabe, who has ruled since independence in 1980, and his Zanu-PF party, embarked on a campaign to dismantle Zimbabwe's established institutions, participated in egregious human rights violations and systematically undermined the rule of law. President Mugabe introduced a legal infrastructure to outlaw dissent, embarked on a violent "fast-track" land reform project and, along with the rest of his party, increased the use of racist political rhetoric to induce fear and subdue any and all opposition.

The run-up to the June 2000 parliamentary and March 2002 presidential elections bore witness to widespread state-sponsored electoral violence, coercion, intimidation and manipulation. In particular, these two elections incorporated the war veterans and youth militia; whose brutal use of violence and intimidation was systematically used as a mechanism for state-sponsored repression throughout the remainder of the decade.

Zanu-PF's electoral strategy was to suppress competitive party politics and eliminate all political competition, particularly that levied by the Movement for Democratic Change (MDC). Land seizures were central to Zanu-PF's electoral strategy in that they effectively disenfranchised farmers and farmworkers, who were widely viewed as MDC supporters. On 5 April 2000, the Zanu-PF-controlled parliament passed Constitutional Amendment 16 which maintained that the United Kingdom, not Zimbabwe, has the sole obligation to pay compensation for agricultural land forcibly acquired for resettlement. Following the surprise June 2000 victory of the MDC, in which the party took nearly half of the parliamentary seats, Zanu-PF and its supporters embarked on an accelerated campaign of violent land occupation and forced land redistribution, to the dismay of the international community and the southern African region.

In 2000, there were some 4,500 white commercial farmers, occupying 11m hectares of land and producing over 70 per cent of agricultural output; that figure fell to approximately 500 by 2008.¹ Land seizures caused a flight of international capital and domestic wealth, exacerbating an economic crisis that began in the late 1990s. Severe fiscal mismanagement and poor monetary

¹ Brian Raftopoulos, "The Crises in Zimbabwe, 1998-2008," in *Becoming Zimbabwe: A History from the Pre-colonial Period to 2008*, Eds. Brian Raftopoulos and Alois Mlambo (Johannesburg: Jacana Media, 2009): 216.

policy created the conditions for hyperinflation and an unemployment rate of 95% by 2009.² The International Bank of Reconstruction and Development and the International Monetary Fund suspended the lending and voting rights of Zimbabwe when the country's arrears reached US\$140 million,³ although both continued to provide technical assistance and analysis. Political manipulation of food became common practice with grain supplied by the World Food Programme being distributed, directly by the government, on the basis of political affiliation.⁴

Repressive legislation, including three constitutional amendments, was passed between 2000 and 2007. These included the notorious *Access to Information and Protection of Privacy Act*,⁵ which criminalised the practice of journalism without a licence and the *Public Order and Security Act*,⁶ which severely restricted freedom of speech and assembly in addition to granting unprecedented powers to the police. A series of constitutional amendments included:

- Constitution of Zimbabwe Amendment (No. 16) Act, 2000 - Principal effect was to make Britain responsible for establishing a fund to pay compensation for agricultural land compulsorily acquired for resettlement and at the same time to relieve the Zimbabwe government of any obligation to pay such compensation. Even where compensation for land was payable, there was no requirement that it should be "fair" or "adequate" or represent the market value of the land.⁷
- Constitution of Zimbabwe Amendment (No. 17) Act, 2005 - Effectively vested ownership of agricultural land, compulsorily acquired for resettlement purposed in the land reform programme, in the state. It prevented the courts from challenging any such acquisition.⁸
- Constitution of Zimbabwe Amendment (No. 18) Act, 2007 - Allows the President to choose a successor if he retires mid-term by empowering parliament, which is dominated by his party, to vote for a president.⁹

In response to the deteriorating stability within Zimbabwe and the risk it posed to the region, Western governments levied coordinated restrictive measures against high-ranking members of Zanu-PF and other influential officials, as well as specific entities believed to be gaining from systematic human rights abuses and the aberration from the rule of law. However, a chorus of African states, led by the SADC, the AU and member states within both organisations, have labelled these measures as counterproductive to forming a GNU.¹⁰

² Central Intelligence Agency, "The World Factbook: Zimbabwe," 28 June 2010.

³ International Monetary Fund, "IMF Executive Board Restores Zimbabwe's Voting Rights and Takes Steps Towards Unfreezing Access to the General Resources Account," Press Release No. 10/53, 10 February 2010, <http://www.imf.org/external/np/sec/pr/2010/pr1053.htm> (22 July 2010).

⁴ ICG: Zimbabwe: The Politics of National Liberation and International Division No. 52 17 Oct 2002.

⁵ *Access to Information and Protection of Privacy Act*, Chapter 10:27, 15 March 2002, Part XII, Section 79.

⁶ *Public Order and Security Act*, Chapter 11:17, 22 January 2002.

⁷ Constitution of Zimbabwe Amendment (No. 16) Act, 2000, *Government Gazette Extraordinary*, 19 April 2000.

⁸ Constitution of Zimbabwe Amendment (No. 17) Act, 2005, *Government Gazette Extraordinary*, 14 September 2005.

⁹ Constitution of Zimbabwe Amendment (No. 18) Act, 2008, *Government Gazette Extraordinary*, 30 October 2007.

¹⁰ Southern African Development Community, *Communiqué 2007 Extra-Ordinary SADC Summit of Heads of State and Government: Dar-es-Salaam*, 28-29 March 2007. <http://www.dfa.gov.za/docs/2007/sadc0330.htm>.

Definitions of Sanctions and Restrictive Measures

Sanctions and restrictive measures do not have a universal definition, but are generally used by the international community as a tool to effect change in the behaviour or policies of states. Restrictive measures have similar aims as sanctions; however, they are directed at specific persons or entities that threaten international security. Restrictive measures do not use force or engender collective punishment; they are not directed at the state. In the case of Zimbabwe, restrictive measures were designed to achieve a number of objectives; principally:

- Target a select group of the political elite without jeopardising the national economy or exerting a negative impact on the humanitarian condition of the greater population,¹¹
- Compel sanctioned persons and entities to change their behaviour by no longer supporting violations of human rights, illegal land seizures and undermining the rule of law; and
- Provide support and legitimisation to the opposition and civil society.

The restrictive measures taken were largely in the form of arms embargoes, targeted travel bans and targeted financial sanctions.

Zimbabwe Restrictive Measures

No comprehensive or international trade and investment sanctions comparable to those imposed, for example, on apartheid South Africa or white-minority Rhodesia are currently in place against Zimbabwe. Bilateral trade and humanitarian assistance from the USA, the European Union (EU) and EU countries, Norway, Australia and New Zealand have not ceased at any time during the implementation of restrictive measures. The existing restrictive measures consist of targeted or smart sanctions, imposed by Western governments, namely from the EU and countries aligned to EU policy such as Norway, the USA, Australia, Switzerland and New Zealand, against selected individuals in the Zanu-PF government and others implicated in human rights violations. The targeted sanctions currently applicable in Zimbabwe include:

- Prohibitions on arms sales to the government of Zimbabwe and its subsidiaries;
- Restrictions and bans on visas for members or supporters of the Mugabe regime, including senior management officials of specified state-owned companies (parastatals), to travel to countries that have imposed restrictive measures;
- Restrictions on financial transactions involving specified individuals and entities; and
- Freezing of assets of targeted individuals and entities.

Arms embargoes are applied to stem the flow of arms, military equipment and technical expertise to regimes that are likely to use them for internal repression or aggression against another state. In the case of Zimbabwe, restrictions on arms and military-related items were the first in a series of actions taken by the United Kingdom, followed by the United States, Norway and the European Union in 2002 in response to increasing repression of MDC supporters and opposition members, military involvement in the Democratic Republic of Congo, as well as the deportation of Pierre Schori, the head of the EU observation delegation for the 2002 presidential elections.

¹¹ Judy Smith-Höhn, "Zimbabwe: are targeted sanctions smart enough? On the efficacy of international restrictive measures," Institute for Security Studies, 4 June 2010. <http://www.iss.co.za/uploads/4Jun2010.pdf>

The Commonwealth Ministerial Action Group was heavily engaged with Zimbabwe's political leadership when forced land evictions reached their crescendo following Zanu-PF constitutional defeat. Zimbabwe's refusal to honour either the Harare Declaration (1991) and the Abuja Agreement (2001), the latter having been endorsed by the SADC, resulted in the UK withdrawing from its pledge to compensate those who lost their property during Zimbabwe's forced land evictions and seek Zimbabwe's suspension from the Commonwealth of Nations. It was not until a Commonwealth Observer Group declared that the 2002 presidential elections were not free and fair that the Commonwealth suspended Zimbabwe on the grounds that Mugabe and Zanu-PF had rigged the 2002 presidential election and persecuted his political opponents. Following the initial suspension, when the Zimbabwe government continued the land invasions, human rights violations and showed no demonstrable commitment to freedom of expression,¹² members extended the suspension indefinitely in 2003, causing Mugabe to withdraw Zimbabwe from the organisation.

Targeted travel bans and targeted financial sanctions have been used against approximately 200 individuals and 50 entities as of September 2010¹³. Travel bans prevent specific individuals from entering, or transiting within, specific countries and territories. It is however important to note that these bans do not apply to attendance of meetings of international organisations. Australia and New Zealand, in addition to restricting members and allies of Zanu-PF from entering their countries, have restrictions on all travel and student visa applications from adult children of Zimbabwean individuals subject to Australian travel and financial targeted sanctions.¹⁴ While Zimbabwe continues to receive various forms of Western aid, all the countries that have imposed targeted sanctions have downgraded government-to-government contacts at multilateral forums. Targeted financial sanctions have been applied to senior members of Zanu-PF, close relatives of government officials and anyone thought to be directly gaining from Zanu-PF policies.

In the past, country-wide sanctions had the same intentions as restrictive measures; that is to alter objectionable behaviour and policies of the state and those responsible for administering them. Nevertheless, sanctions of this manner have had varying levels of impact and success. Sanctions against apartheid South Africa, including disinvestment, as well as sport, cultural and academic boycotts, were largely considered a successful paradigm. While ego-bruising, these sanctions are believed to have brought the South African National Party to near bankruptcy and encouraged it to negotiate.¹⁵ On the contrary, sanctions placed on Iraq following the 1991 Gulf War were considered a failure. UN Humanitarian Coordinator Denis Halliday posited that the sanctions did nothing for governance and strengthened the regime as many Iraqis suffered due to the impact of sanctions, which resulted in the breakdown of essential services such as water and sanitation and the unavailability of an adequate diet.¹⁶ Unlike South Africa or Iraq, the issue of Zimbabwe was not

¹² "Revisiting The Commonwealth and Zimbabwe: What is to be Done? An Assessment of Zimbabwe's Performance since its Withdrawal from the Commonwealth & Suggestions for Re-engagement by the Commonwealth," Zimbabwe Human Rights NGO Forum, November 2007.

¹³ See Appendix B.

¹⁴ "Zimbabwe: Targeted Sanctions Regime," The Australian Government, The Department for Foreign Affairs and Trade, <http://www.dfat.gov.au/un/unsanctions/zimbabwe.html>.

¹⁵ Alexander Lavery, "Impact of Economic and Political Sanctions on Apartheid," *The African File*, 7 June 2007, Online Edition, <http://theafricanfile.wordpress.com/ucsd-2/impact-of-economic-and-political-sanctions-on-apartheid/>.

¹⁶ BBC News "World: Middle East UN Official Blasts Iraq Sanctions," <http://news.bbc.co.uk/2/hi/183499.stm>, 20 September 1998.

taken up in the UN Security Council. South Africa's holding of the Security Council presidency in 2007 played a crucial role in containing the conflict to regional level.

The 2000, 2002 and 2005 Elections and the International Response

The parliamentary elections in 2000, presidential elections in 2002 and the parliamentary elections in 2005 were all held with restrictive measures in place. During each of these election periods, intimidation and violence were rife as was widespread evidence of voting irregularities¹⁷. The 2005 election fell far short of the SADC Principles and Guidelines Governing Democratic Elections adopted in Mauritius in 2004. However, these Principles are not legally binding.

In particular, the 2005 elections saw Zanu-PF retake a two-thirds majority in parliament despite strong evidence that the elections did not reflect the will of the Zimbabwean people¹⁸. Regional and international election observers included the SADC, the AU, and the Non-Aligned Movement and the UN. International Crisis Group reported that invitations were also issued to seven liberation movements, mostly from Southern Africa, and to 32 countries (23 African, five Asian, three from the Americas and Russia)¹⁹. The EU, the Commonwealth, the United States, the Congress of South African Trade Unions and the Electoral Institute of Southern Africa were not invited to send observers, nor was the SADC Parliamentary Forum, which had observed the 2000 and 2002 elections and presented critical reports²⁰.

The Zimbabwe Election Support Network (ZESN), a long-established NGO coalition, sent observers into the field several months before the election and deployed 6,000 observers to two-thirds of the approximately 8,200 polling stations on the day of the election²¹. ZESN reported a reduced level of violence in the run-up to the election as well as peaceful voting on polling day. However, it reported that traditional leaders had threatened their subjects with eviction and other unspecified action if they failed to vote for the ruling party; that opposition parties were not free to campaign in certain parts of the country; and that intimidation included the politicisation of food distribution²². It also noted widespread discrepancies between the number of people recorded as having voted and the final vote tallies in many districts, particularly in Zanu-PF rural strongholds²³. The failure of these elections to be free and fair highlighted both the illegitimacy of Zanu-PF's position in Zimbabwean politics as well as the inability of the restrictive measures to change the behaviour of those who had been targeted. Additionally, the endorsement given by the SADC

¹⁷ Zimbabwe Human Rights NGO Forum, "Human rights and Zimbabwe's June 2000 Election: Special Report 1," January 2001; United States Department of State, "US Reiterates Stand that Zimbabwe Election was 'Seriously Tainted'," <http://www1.voanews.com/english/news/a-13-2005-04-05-voa67-67385162.html>, 5 April 2005.

¹⁸ BBC News "Straw condemns Zimbabwe elections," http://news.bbc.co.uk/2/hi/uk_news/politics/4412763.stm, 5 April 2005.

¹⁹ ICG, *Post-election Zimbabwe: what next?* Africa Report No. 93, 7 June 2005, Link from: <http://www.crisisgroup.org/home/index.cfm?l=1&id=3499>; and House of Commons Library, "Zimbabwe After the 2005 Election," Research Paper 05/58, 18 August 2005.

²⁰ Ibid.

²¹ Dr. R. Matchaba-Hove, "ZESN Statement 2005 Parliamentary Elections," Zimbabwe Election Support Network (ZESN), 3 April 2005.

<http://www.idea.int/africa/southern/upload/ZESN%20Statement%202005%20Parliamentary%20Elections-2.pdf>

²² House of Commons Library, "Zimbabwe After the 2005 Election," Research Paper 05/58, 18 August 2005.

²³ Ibid.

undermined the perceived legitimacy that the West accorded to the SADC to intervene and determine viable solutions to Zimbabwe's political crisis²⁴. As a result, many Western governments reinforced their restrictive measures, becoming less open to the removal of these measures.

In an effort to produce free and fair elections in 2008, the Electoral Laws Amendment Bill was passed in 2007 with the support of Zanu-PF and the MDC parties. The Bill, a result of negotiations led by South Africa, sought to create an impartial electoral commission, an independent audit of the voters' roll, the criminalisation of intimidation, the ability for parliament to choose a presidential successor if the incumbent is unable to complete his term in office, *inter alia*²⁵.

Despite the deterioration of Zimbabwe's institutions and systematic disregard for human rights by Zanu-PF, the West, including the EU and EU countries, Norway and the United States continued bilateral trade and humanitarian aid in accordance with the Hague Principles for International Engagement with Zimbabwe²⁶. At no time were general sanctions placed against Zimbabwe. Between 2002 and 2008, Zimbabwe received over US\$900 million for humanitarian aid and social causes from the United States²⁷. The EU has provided €572 million in humanitarian and essential development aid since 2002²⁸. In addition, as a compromise with the MDC and other stakeholders, the international community established the Multi Donor Trust Fund as a stop-gap measure to fund pressing humanitarian concerns and provide budgetary support until confidence is restored in Zimbabwean institutions; particularly the Reserve Bank of Zimbabwe (RBZ)²⁹.

The 2008 Elections

The 2008 parliamentary and presidential elections took place concurrent with a mediation process initiated by the SADC, led by former South African President Thabo Mbeki, with the support of the AU and the United Nations. Prior to the election, Mbeki helped negotiate the Electoral Act (2008) that, among other things, included displaying results outside polling stations. However, the display of results was only applied to individual polling stations and was violated at ward and constituency polling stations: this enabled Zanu-PF to delay the results and manipulate the findings³⁰.

The election results radically changed Zimbabwe's political landscape. The MDC-T³¹ won control of parliament, despite voter intimidation, arbitrary arrest and detention of MDC candidates and organised violence, including the torture and death of opposition members, supporters and human

²⁴ See [Southern Africa Development Community \(SADC\) Election Observation Mission Preliminary Statement](#)

²⁵ "Zimbabwe passes 2008 election law," BBC News, 20 September 2007, Online Edition; and "Electoral Laws Amendment Bill, 2007: An Analysis by the Zimbabwe election support network," Zimbabwe Election Support Network (ZESN), 28 November 2007.

²⁶ Donors used the Hague Principles as benchmarks of re-engagement until 2009 when the GPA came into effect. From that point, donors have used benchmarks laid out within the GPA.

²⁷ Bureau of African Affairs, "Background Note: Zimbabwe," U.S. Department of State, 23 April 2010.

²⁸ EUROPA "Commission allocates €15 million to address ongoing humanitarian needs in Zimbabwe," 23 July 2010.

²⁹ The MDTF is administered by the World Bank, IMF, African Development Bank and the United Nations Development Programme. Donors include: the World Bank, IMF, EU, WHO, WFP, IOM, ILO, USA, UK, Canada, Australia, Germany, France, Denmark, Netherlands, Norway, Sweden, Japan, South Africa, and the UN.

³⁰ Interview with civil society member on 7 September 2010.

³¹ The MDC split into the MDC-Tsvangirai (MDC-T) and MDC-Mutambara (MDC-M) after a disagreement over whether to boycott the 2005 Senate elections.

rights defenders. The presidential results were kept secret for over a month, permitting an opportunity for manipulation of the results, until an announcement was eventually made calling for a run-off between President Mugabe and MDC-T leader Morgan Tsvangirai as both failed to attain 50 per cent of the vote. In the interim, an increase in state-sponsored violence and repression forced Morgan Tsvangirai to withdraw from the election, handing the presidency to Mugabe. International pressure increased dramatically; with international observers condemning the elections as seriously flawed. Mugabe failed to receive an endorsement from his fellow African leaders; thereby increasing the pressure for him to appear more open or to participate more obviously in the Mbeki-led mediation, eventually paving the way for the GNU.

The Government of National Unity

Following a series of intense negotiations led by SADC, ten months after the 2008 election, MDC-T decided it would join ZANU-PF and MDC-M in an inclusive government to begin to rebuild the country. The GNU included a mandate for all parties to work towards the removal of the West's restrictive measures. However, 19 months on, the GNU has failed to make progress on this issue. Serious questions continue to be asked by the West, particularly given the unilateral appointment of cabinet posts, provincial governorships and judicial posts by the President, including the reappointment of Gideon Gono as the Governor of the RBZ and Johannes Tomana as the Attorney General.

Perceptions of re-engagement have been mixed. There has been intense dialogue with donors following the GPA. High-level political engagements have taken place; Danish and Norwegian politicians, including the Ministers of Development, travelled to Harare in March 2009 for consultations. An EU delegation was led by Karel De Gucht to Harare in September 2009 and a recent Zimbabwean delegation went to Brussels in July 2010. Additionally, there has been a broad and encompassing discussion around "humanitarian-plus," a donor strategy targeting education, health and water systems, basic civil service support and critical infrastructure. There has also been consistent pressure applied by civil society bodies in Zimbabwe to lay out the grounds for re-engagement with Zimbabwe³².

Many within Zimbabwean politics believe the international community has been slow to embrace the new GNU³³, whilst others have expressed cynicism about Zanu-PF's intentions³⁴. As a direct result of Mugabe and Zanu-PF's actions, the international community has maintained restrictive measures that were in place prior to the election. Both the EU and the United States renewed most of their restrictive measures in 2008 and 2009 citing the need for greater reform. Many saw as justification for the renewal of these measures government activities in the Marange diamond fields in eastern Zimbabwe. Calls have been made for Zimbabwe to be suspended from the Kimberley Process Certification Scheme as the discovery of diamonds has "brought with it armed security forces, violence, human rights abuses, increased social instability and environmental

³² For example, see: "Benchmarks for Re-engagement by the International Community," Research & Advocacy Unit, 11 February 2009.

³³ "What Options for Zimbabwe?" Solidarity Peace Trust, 31 March 2010.

³⁴ "What are the options for Zimbabwe? Dealing with the obvious!" Research and Advocacy Unit, 4 May 2010.

degradation³⁵.”

Targeted Restricted Measures Eight Years On

A fundamental issue that has not been successfully addressed in the Zimbabwe restrictive measures debate is whether the measures have hit their target. Put differently, have the current measures been strong enough to make an impact on Zanu-PF and force it to change its political course?

One position is that the direct impact of restricted measures on the targeted Zanu-PF individuals has been minimal and that Zanu-PF officials have actually benefited, especially in terms of political capital and unrestricted looting of national resources during the financial crisis in the country. Another position is that restricted measures have worked, given the public outcry from Mugabe and his associates.

Zanu-PF has used restrictive measures as propaganda, a negotiating tool and as a pretext for non-implementation of democratic reforms and the maintenance of power structures and patronage. Zanu-PF has repeatedly branded restrictive measures as sanctions and said that the measures imposed by the West are illegal and are meant to serve the cause of imperialists and colonialists³⁶. One of Mugabe's greatest survivalist strategies has been legitimising the language of anti-imperialism and black victimisation which has been absorbed and reinforced by other African leaders³⁷. For example, the Namibian President, Sam Nujoma, was quoted as follows, “Here in southern Africa we have one problem... Blair is here... the man who went out to campaign for sanctions against Zimbabwe while the British owned 80 per cent of Zimbabwe's land³⁸.” As a result, Zanu-PF has refused to make any further concessions within the framework of the GPA, whilst applying pressure on the MDC to seek the removal of all restrictive measures.

MDC-T believes that restrictive measures should be lifted with conditions and benchmarks attached in a process that should ultimately lead to credible elections and a smooth transfer of power³⁹. While MDC-T is obliged under the GPA to publicly campaign for the lifting of restrictive measures, the party believes that the conditional removal of restrictive measures can lead to broader reforms being implemented before elections are carried out. However, it must be recognised, particularly by the SADC, that MDC-T cannot force the West to remove restrictions.

³⁵ Claude Kabemba, *The Kimberley Process and the Chiadzwa Diamonds in Zimbabwe: Challenges and Effectiveness, Perspectives: Political Analysis and Commentary from Africa*, Heinrich Böll Stiftung.

³⁶ Sydney Kawadza, “No Agreement Yet - President,” *The Herald*, 27 March 2010, Online Edition; and Blessing Zulu, “S.African Research Institute Says Zimbabwe Sanctions Have Had Little Impact,” *Voice of America News*, <http://www1.voanews.com/zimbabwe/news/SA-Think-Tank-Says-Mugabe-Sanctions-Ineffective-95878154.html>, 8 June 2010.

³⁷ Sokwanele, “Mugabe and the struggle for the African Self,” *The Zimbabwean*, 29 August 2010, http://www.thezimbabwean.co.uk/index.php?option=com_content&view=article&id=33816:mugabe-and-the-struggle-for-the-african-self-&catid=35:opinion-a-analysis&Itemid=31; see also: Ian Phimister and Brian Raftopoulos, “Mugabe, Mbeki & the politics of anti-imperialism,” *Review of African Political Economy*, 1740-1720, Volume 31 (2004):385 – 400.

³⁸ John Battersby, Christelle Terreblanche, Basildon Peta and Sello Motseta, “Don't mess with us, Mugabe tells Blair,” *The Star*, 2 September 2002, Online Edition.

³⁹ Interviews with MDC-T members on 27 July 2010.

The Impact of Restrictive Measures

Those who say that restrictive measures have worked believe that evidence lies within the public outcry from Mugabe and his associates⁴⁰. Travel bans have named-and-shamed individuals and entities that have engaged in egregious violations of human rights and have profited from such.

The travel ban has undoubtedly inconvenienced individuals within Zanu-PF in the sense that they cannot pick and choose destinations as they did in the past. The refusal of visas to travel through Europe has been a major source of international embarrassment among some of the targeted leaders. This has been apparent in comments made by restricted individuals who have been denied visas or detained at European airports.⁴¹ In addition, a former sanctioned Zanu-PF official acknowledged that travel bans have been a major impediment for those who have business and personal obligations in countries they are no longer able to enter⁴².

A wide cross-section of sources interviewed for this study stated that travel bans have not impeded either the GNU or the implementation of the GPA. Individuals with travel bans have been allowed to travel to forbidden destinations if their visit pertains to business under the context of the GPA or GNU. Despite these convictions, restrictive measures suffer from key weaknesses. The foremost weakness of restrictive measures - including the arms embargo, targeted travel bans and targeted financial sanctions - remains the lack of international consensus surrounding their objectives and the uncoordinated lists of targeted individuals and entities.

The lack of a comprehensive international arms embargo has undermined the restrictions currently in place. Despite embargoes placed by some in the West, Zimbabwe's defence ministry remains inextricably linked to arms manufacturers within Europe and the United States. An International Peace Information Service Report identified weapons and weapons parts transfers occurring within Montenegro (not within the EU) and the USA. Porous borders have also allowed illegal arms trafficking to flourish between Zimbabwe, neighbouring countries and the Democratic Republic of Congo. In December 2008 the United Nations Security Council's Group of Experts on the Democratic Republic of Congo reported multiple deliveries of approximately 53 tons of ammunition⁴³.

China has flouted the arms embargo. In April 2008, during the height of the political crisis, a Chinese ship loaded with armaments docked in the port of Durban. Although South African government spokesperson Themba Maseko stated that, "We [South Africa] are not in a position to act unilaterally and interfere in a trade deal between two countries⁴⁴," the South African Transport and Allied Workers Union refused to unload the cargo. The controversial deal highlighted a sharp

⁴⁰ Interviews with Zimbabwean politician on 27 July 2010.

⁴¹ See 'ZANU PF bitter about travel restrictions', *The Zimbabwe Telegraph*, www.zimtelegraph.com, 17 August 2009; 'Patrick Chinamasa detained in German International airport', www.zimdiaspora.com, 3 July 2010.

⁴² Interview with Zimbabwean politician on 27 July 2010.

⁴³ Brian Johnson-Thomas and Peter Danssaert, "Zimbabwe-Arms and Corruption: Fuelling Human Rights Abuses," July 2009 http://www.irinnews.org/pdf/Zimbabwe_Arms_and_Corruption_Fuelling_Human_Rights_Abuses.pdf; Report of the UN Group of Experts on the DR Congo, 12 December 2008, S/2008/773 http://www.friendsofthecongo.org/pdf/un_report_dec_08.pdf

⁴⁴ "Government Sails in Troubled Waters," *The Mail and Guardian*, 24 April 2008.

disagreement between the South African government and its union partners, with South African Transport and Allied Workers Union General Secretary Randall Howard openly stating that, “Satawu does not agree with the position of the South African government not to intervene with this shipment of weapons⁴⁵.”

Travel restrictions have not seriously impacted on targeted individuals for a number of reasons. The bans have not been coordinated well within the international community. This policy discordance has undermined the credibility of the bans and raised questions as to the real motives of Western restrictive measures, particularly among African states. The USA and EU restrictive measures have incorporated almost all prominent Zanu-PF government and party officials, their personal businesses and parastatals. This style of broad targeting can weaken efforts to encourage reformist elements within Zanu-PF, as well as qualified personnel and resources⁴⁶. Individuals against whom measures have been applied dubiously include former Minister of Health and Child Welfare Timothy Stamps. Stamps retired from government in 2002 and has been recognised as successfully leading the Ministry in the early 1980s and 1990s⁴⁷. A recent Institute for Security Studies report cites other questionable names, including journalists Judith Makwanya of Zimbabwe Broadcasting and Caesar Zvayi of *The Herald*⁴⁸. Charges against these individuals should be made public in order to legitimise the imposition of restrictions and dislodge false claims made by Zanu-PF.

Further, the limitations of the travel bans have not been clearly defined. International protocol allows heads of state to attend international meetings, regardless of travel restrictions. During the preparations for the 2003 EU-Africa Summit in Lisbon confusion and controversy arose among participating states over the participation of Mugabe. African states heavily criticised the ban with South Africa threatening to boycott the Summit altogether if Mugabe was not allowed to attend. The Summit was postponed until December 2007 when Portugal decided to allow Mugabe to attend despite the EU-imposed travel ban; heavily undermining the credibility of the restrictions.

The fact that the travel restrictions apply only to a few powerful countries, and allow travel exemptions for participation in international meetings, has given Zanu-PF leaders the opportunity to circumvent the ban. Targeted individuals have thus been able to conduct their personal business while travelling to these international events, such as UN meetings⁴⁹. Despite the travel bans, Mugabe has travelled to the UN in New York in 2002, to multiple Food and Agriculture Organization (FAO) summits in Rome, including in November 2009, to the Vatican City for the funeral mass of Pope John Paul II in 2005 and to the UN climate talks in Copenhagen in 2009. In 2002, Police Chief Augustine Chihui travelled to Lyon for an Interpol meeting. Finally, former Finance Minister Herbert Murerwa and Reserve Bank Governor Gideon Gono travelled to Washington, DC in 2005

⁴⁵ “Union Refuses to Touch Zim Arms,” *News24*, 17 April 2008.

⁴⁶ U.S. Senator Russ Feingold, “Feingold Statement Upon Introducing New Legislation on Zimbabwe – For the Congressional Record,” <http://feingold.senate.gov/record.cfm?id=324648>, 4 May 2010.

⁴⁷ Briggs Bomba and William Minter, “Zimbabwe: Demystifying Sanctions and Strengthening Solidarity,” 15 April 2010.

⁴⁸ Ibid.

⁴⁹ Institute for Security Studies, *Zimbabwe: Are targeted sanctions smart enough? On efficacy of international restrictive measures*, ISS Situation Report, 4 June 2010, p.4; M. Erikson, *Targeting the Leadership of Zimbabwe: A path to Democracy and Normalization* (Uppsala University, Department of Peace and Conflict Research, 2007): p.23.

to attend a meeting with the IMF Executive Board. The opportunities for these individuals to conduct personal business are all but impossible to prevent.

A significant number of individuals included in the travel ban had not frequently visited the countries that imposed these bans, which meant the bans were largely symbolic to them, although not meaningless to the democratic movement in Zimbabwe. Even those who used to travel to Europe and the USA on holiday or business before the ban, including Mugabe himself, have managed to circumvent the ban, for example by identifying alternative destinations for their holidays, shopping and business. For example, Grace Mugabe, wife of Robert Mugabe, known for her penchant for luxury shopping, is currently under travel restrictions in both the USA and Europe for her acquisition of multiple formerly white-owned farms, *inter alia*. Unable to visit North America or Europe, she now travels to Malaysia and Hong Kong to shop and visit her daughter, Bona Mugabe, who attends university in Hong Kong⁵⁰.

Moreover, Australia and New Zealand are the only countries that have extended travel restrictions to adult children of Zanu-PF officials and their allies. In other countries, targeted individuals have circumvented the ban by using their adult children who are spread across Europe and the USA to conduct business on their behalf. At the same time, the exemption of these children from travel restrictions has meant that their parents have been able to shield them away from the socio-economic hardships in the country and the negative effects of the crumbling educational, health and other social services by sending them to study or live in the very countries that have imposed the restrictive measures⁵¹.

The logic behind targeted financial sanctions, which include freezing the assets of targeted individuals and entities, is to restrict their financial transactions and in the process reduce their economic muscle. The costs to such targets include not only the money and assets that have been frozen but also the opportunity cost associated with the measures. While the former is easily quantifiable by looking at the financial statistics, the opportunity costs arising from the prohibition are almost impossible to quantify⁵². In the case of Zimbabwe, there is no evidence to date that Zanu-PF and its allies have been seriously affected by the measures or asset freezes. First, the amount of money or assets belonging to targeted Zanu-PF leaders and their allies seized abroad to date has been negligible. By August 2005, for instance, reports from the EU were that assets worth €825,000 had been seized and frozen by EU member states⁵³. The UK on its own had managed to freeze a paltry £160,000 by 2006; an amount so small that even the House of Lords Select Committee on Economic Affairs conceded that “both in absolute terms and relative to the probable resources of the targets it is doubtful whether asset freezes are effective as a means of inhibiting or

⁵⁰ Jon Swain and Michael Sheridan, “Mrs Mugabe assaults our photographer outside her luxury Hong Kong hotel,” *The Times*, 18 January 2009, Online Edition. <http://www.timesonline.co.uk/tol/news/world/africa/article5537251.ece>

⁵¹ A significantly large number of ZANU PF leaders’ children are currently residing or studying in the UK and other parts of Europe, the US and Canada. See list of children of ZANU leaders living abroad on ‘Fair Deal: The Relaunch’, www.zimdaily.com, 15 July 2008.

⁵² UK Govt House of Lords, *The Impact of Economic Sanctions Vol.1 Report*, (Select Committee on Economic Affairs Second Report of Second session 2006-07), p.24.

⁵³ ‘Government/ZANU PF loses Z\$800 million dollars to sanctions’, *Zimbabwe Independent*, 12 August 2005.

changing the behaviour of those who are targeted”⁵⁴.

The targeted financial sanctions have been less effective partly because of the huge time lapse between their announcement and their implementation, which gave targeted individuals and companies with assets and money in Western banks enough time to move their accounts and assets⁵⁵.

The Zanu-PF regime has minimised the effect of targeted financial sanctions on its international business operations through the use of false or proxy names, collaborating sanction busters and front companies.⁵⁶ As revealed in its own internal financial enquiry, held in 2004, to beat targeted sanctions, Zanu-PF had formed shelf companies to warehouse its shares in various corners of the economy. The party also acknowledged that it had been moving funds from well-known party firms to lesser-known shelf companies to secure its investments⁵⁷.

To circumvent suspension from IFIs and decreased aid from the West, Zimbabwe sought closer ties in Asia. In a bid to counter the West’s restrictive measures, Zimbabwe embarked on a “Look East Policy” that has seen closer relations with China, Indonesia, India, Iran, Malaysia, North Korea and Singapore. China, in particular, with its no-strings-attached aid policies, seeks to “encourage and facilitate more Chinese companies to seek development in Zimbabwe.” China’s role in Zimbabwe is elusive; mainly because bilateral relations are largely confidential and closely maintained by Beijing and Harare. However, China has played a role in the Zimbabwean economy, despite the exodus of foreign capital. In 2008, China signed a US\$42 million loan to support Zimbabwe’s farm mechanisation programme, and in 2009, Zimbabwe secured credit lines of US\$950 million to support infrastructure projects and to purchase Chinese goods⁵⁸.

In addition to Asian influence, numerous credit lines from SADC countries have been pledged to Zimbabwe, including US\$70 million from Botswana in 2009 (not yet released), US\$10 million from the African Development Bank Group (AfDB) and the Zambia National Commercial Bank in February 2010; US\$50 million was pledged by Angola in 2010 and, as of May 2010, South Africa is negotiating a US\$50 million line of credit⁵⁹. The African Export Import Bank (Afreximbank) is one of the few international financial institutions that continues to lend to Zimbabwe. Afrximbank approved lines of credit worth \$US60 million in July 2009 and most recently for \$US100 million in

⁵⁴ *The Impact of Economic Sanctions Vol.1 Report*, UK House of Lords: p.26.

⁵⁵ Judy Smith-Höhn, “Zimbabwe: are targeted sanctions smart enough? On the efficacy of international restrictive measures,” Institute for Security Studies, 4 June 2010. <http://www.iss.co.za/uploads/4Jun2010.pdf>.

⁵⁶ See ‘ZANU PF busts embargo’, *Zimbabwe Independent*, 29 October 2004; ‘ZANU PF busts EU farm inputs sanctions’, *The Zimbabwean*, 29 September 2009; ‘Zim chiefs use diplomats to bust sanctions’, *Financial Gazette*, 8 August 2002.

⁵⁷ See ‘ZANU PF busts embargo’, *Zimbabwe Independent*, 29 October 2004.

⁵⁸ Celia W. Dugger, “Zimbabwe Says China Is Giving It Loans,” *The New York Times*, 30 June 2009, Online Edition.

⁵⁹ Alex Bell, “Botswana Pledges Credit Line As SADC Funding Deadline Expires,” *SW Radio Africa*, 16 April 2009; AfDB and Zambia National Commercial Bank Sign Line of Credit Agreement (<http://www.afdb.org/en/news-events/article/afdb-and-zambia-national-commercial-bank-sign-line-of-credit-agreement-5625/>); “President Dos Santos Contributes to Stability in Zimbabwe – Diplomat,” *All Africa.com*, 22 July 2010, Online Edition; “Biti to Negotiate Lines of Credit With SA Counterpart,” *The Herald*, 7 May 2010.

August 2010⁶⁰. These credit lines, while providing some assistance, only make a small dent in what Zimbabwe requires.

Private commercial banks have circumvented restrictive measures by purchasing Zimbabwean treasury bills and government bonds. Three British firms, Barclays, Old Mutual and Standard Chartered Bank, have been accused of both directly and indirectly supporting Mugabe with US\$1 billion⁶¹. Barclays loaned £30 million to provide state-sponsored agricultural capacity to sustain Mugabe's land reforms⁶². In order to remain in business within Zimbabwe, firms are required to comply with regulations of the RBZ; many of which have considerably harmed the Zimbabwean economy and remain a significant line of patronage for those committing egregious human rights violations. In 2009, the BBC uncovered an attempt by Vice President Joyce Mujuru to sell 3.7 tons of Congolese gold, with her daughter serving as an intermediary⁶³, to German-based (registered in the UK) Firstar Europe Ltd⁶⁴. The deal was ultimately cancelled.

The diamond rush in Chiadzwa diamond fields in eastern Manicaland Province coincided with the collapse of state institutions in 2006⁶⁵. Shortly after the discovery, the military intervened to take control of the fields while subjecting artisanal miners and area residents to egregious human rights abuses. As a result, Zimbabwe was suspended from importing and exporting diamonds; however, Mugabe and Minister of Mines Obert Mpofu threatened to sell the diamonds outside of the Kimberley Process Certification Scheme. Following an observer mission, a Kimberley Process monitor found that Zimbabwe satisfied the minimum requirements of the Kimberley Process Certification Scheme⁶⁶. Estimates of the worth of the diamond fields range between US\$1 billion to US\$1.7 billion; possibly making Zimbabwe among the top-producing diamond countries in the world⁶⁷. A source close to Mugabe stated that, "This is Zanu-PF's salvation"⁶⁸.

Sale of Zimbabwe's diamond stockpile began in August 2010 with potential buyers from Belgium,

⁶⁰ Unknown author, "Zimbabwe: Afreximbank gives Zim US\$100m line of credit," *Afrique en ligne*, 30 August 2010, Online Edition ([http://www.afriquejet.com/news/africa-news/zimbabwe-afreximbank-gives-zim-us\\$100m-line-of-credit-2010083055266.html](http://www.afriquejet.com/news/africa-news/zimbabwe-afreximbank-gives-zim-us$100m-line-of-credit-2010083055266.html)); Unknown author, "African Export-Import Bank grants Zimbabwe 60 mln USD loan," *Bnet*, 2 July 2009, Online Edition (http://findarticles.com/p/news-articles/xinhua-news-agency-ceis/mi_8007/is_20090702/african-export-import-bank-grants/ai_n41991899/)

⁶¹ Anthony Barnett, "Barclay's Millions Help Prop Up Mugabe's Regime," *The Guardian*, 28 January 2007, Online Edition, <http://www.guardian.co.uk/money/2007/jan/28/accounts.ZimbabweNews>.

⁶² Ibid.

⁶³ Mujuru's daughter, Nyasha del Campo, is based in Spain (as of 2009). Del Campo is not subjected to any restrictive measures.

⁶⁴ Grant Ferrett, "Zimbabwe elite seeks to evade sanctions," *BBC News*, 24 February 2009, Online Edition, <http://news.bbc.co.uk/2/hi/africa/7907278.stm>.

⁶⁵ Claude Kabemba, *The Kimberley Process and the Chiadzwa Diamonds in Zimbabwe: Challenges and Effectiveness, Perspectives: Political Analysis and Commentary from Africa*, Heinrich Böll Stiftung.

⁶⁶ Nelson Banya, "Zimbabwe meets diamond trade standards: monitor," *Reuters*, 8 June 2010, Online Edition, <http://af.reuters.com/article/investingNews/idAFJOE6570E020100608>.

⁶⁷ Ibid.

⁶⁸ Celia W. Dugger, "Diamond Discovery Could Lift Zimbabwe, or Bolster Mugabe," *The New York Times*, 6 June 2010, Online Edition, <http://www.nytimes.com/2010/06/22/world/africa/22zimbabwe.html>. Also see Robyn Dixon, "Death stalks a field of gems," *The L.A. Times*, 12 December 2008, Online Edition, <http://articles.latimes.com/2008/dec/04/world/fq-diamonds4>.

Russia, India, Israel, Lebanon and the United Arab Emirates⁶⁹. Both regional and international businesses have become involved in extraction and investment. The Zimbabwe Mining Development Corporation, a government parastatal that has been targeted by American and European restrictive measures, is working closely with South African companies including Mbada Investments, Canadile Miners and New Reclamation Group (Pvt) Ltd., as well as international companies including Grandwell Holdings (registered in Mauritius) and Core Mining and Minerals Limited (registered in UK). Minister Mpopu has admitted that proper procedures were not followed when contracts were awarded to both Mbada and Canadile, signalling potential corruption and political manipulation⁷⁰.

The implications are considerable. Mugabe has pledged to “jealously guard” natural resources, among concerns that profits will be used as new wealth for Zanu-PF, continue to provide a source for patronage and consolidate and reinforce Zanu-PF influence and power. As recently as April 2010, 18 members of a parliamentary committee were barred from visiting the diamond field on a fact-finding tour.

Effects of Restrictive Measures on the Zimbabwean Economy

The downfall of Zimbabwe’s economy and the country’s continued economic and social challenges after the formation of the GNU cannot be solely blamed on restrictive measures, as Zanu-PF and its allies have tried to suggest. The primary blame for the downward spiral of the national economy undoubtedly has more to do with Zanu-PF’s misgovernance and its penchant for self-destructive economic policies; for example, the post-2000 chaotic and violent land redistribution programme and the Indigenisation and Economic Empowerment Act which obliges all foreign businesses exceeding US\$500,000 or more in capital threshold to cede 51 per cent of their shareholding to ‘indigenous’ Zimbabweans within the next five years⁷¹.

The chronicle of Zanu-PF’s misguided economic policies that have hurt both the economy and the population include the large and unbudgeted payments to war veterans in 1997; the sharp increase in defence spending after the government’s unilaterally entry into the DRC war in 1998; the significant increases of civil service wages in the run-up to the parliamentary elections in June 2000; and the surge in interest as government struggled to service its external debt; all of which pushed the budget deficit to nearly 18 per cent of the GDP in 2000⁷². The 1997 unbudgeted payout of a one-time gratuity of Z\$50,000 (then about US\$4,500), a monthly allowance of Z\$2,000 and

⁶⁹ Michelle Faul, “Zimbabwe gem sale stirs ‘blood diamond’ fears,” *Associated Press*, 11 August 2010.

⁷⁰ Claude Kabemba, *The Kimberley Process and the Chiadzwa Diamonds in Zimbabwe: Challenges and Effectiveness, Perspectives: Political Analysis and Commentary from Africa*, Heinrich Böll Stiftung.

⁷¹ The negative effects of the Act on the economy have already started to be felt as companies owned by white Zimbabweans and foreign firms start to panic. Worried about a possible repeat of the chaotic way in which land has been expropriated from farms owned by white Zimbabweans and foreign companies, some of these companies have either halted their plans for expansion or stopped recruiting more workers. Trading at the ZSE has fallen because of the introduction of this Act. See ‘Empowerment Law threatens major SA investment’, *The Standard*, 27 February 2010; ‘Value of shares traded on ZSE falls 7,6%’, *The Business Herald*, 2 March 2010; ‘Kasukuwere Slams West on Indigenisation’, *The Herald*, 4 March 2010.

⁷² International Monetary Fund, *Zimbabwe: Selected Issues and Statistical Appendix* (IMF Country Report No. 05/359, October 2005), p.18.

free education and health care to approximately 60,000 war veterans accelerated inflation and worsened the growing fiscal deficit.

The total cost of the Zimbabwean government's deployment of 12,000 troops in the DRC between 1998 and 2002 has remained a matter of speculation. However, many observers have argued that the war significantly drained Zimbabwe's treasury and eroded the country's limited foreign currency reserves⁷³. In July 2000, for instance, the government told the IMF that it was spending US\$3 million per month on the DRC war. However, a leaked government memorandum put the cost of involvement for the period between January and June 2000 at US\$166 million, implying that the government was spending a monthly average of US\$27.7 million on the war. In August 2000, the finance minister stated that the government had spent US\$200 million in the DRC since 2000 and concluded that the country could no longer sustain the costs⁷⁴. The fiscal deficit was above 20 per cent of GDP by 2002, and in the absence of balance of support from the IMF and World Bank, most of the fiscal deficit was increasingly funded through domestic borrowing; a situation which exacerbated domestic debt and increased inflation.

Most significantly, the disruption of agriculture - a vital cog in the national economy - was a major impetus in the economy's collapse. Macroeconomic evidence indicates that the Fast Track Land Reform Programme resulted in the severe disruption of commercial agriculture. Agricultural production plummeted since the introduction of the programme in 2000. By 2004, production was estimated to have dropped by 30 per cent. Given the links between agriculture and manufacturing, the manufacturing economy was negatively affected by the slump in agriculture and experienced a contraction of 15 per cent by 2003. These contractions to the agriculture sector were detrimental to the overall Zimbabwean economy. Prior to 2000, the agriculture sector accounted for 9 to 15 per cent of the GDP, and between 20 and 33 per cent of the country's foreign currency earnings⁷⁵.

The pervasive corruption in Zimbabwe has strongly contributed to undermining the national economy and fuelling poverty. Zanu-PF's failure to procure adequate fuel for the nation in the post-2000 period was linked to massive corruption at the government's monopolistic fuel procurement body the National Oil Company of Zimbabwe, while the Zimbabwe Electricity Support Authority's failure to provide the nation with adequate power supplies has more to do with mismanagement than restrictive measures⁷⁶. In 2008, the Zimbabwean government was accused of misusing US\$ 7.3 million belonging to the Global Fund to Fight AIDS, Tuberculosis and Malaria⁷⁷. At the same time, the limited revenue generated from the sale of precious minerals like diamonds has not benefitted the country as revenue has often not been placed into national coffers but into private

⁷³ Independent economic observers have put the cost of the DRC operation at about one billion U.S. dollars. See 'Zimbabwe/DRC: The war that might not have been', *Inter Press Service*, 10 September 2004.

⁷⁴ T. Addison and L. Laakso, 'The Political Economy of Zimbabwe's Descent into Conflict', *Journal of International Development* 15 (2003): 462; S. J. McLaren, 'Mugabe at war: The Political Economy of Conflict in Zimbabwe,' *Third World Quarterly* 23.3 (2002): 513-528.

⁷⁵ P. Zikhali, *Fast Track Land Reform and Agricultural Productivity in Zimbabwe* (Working Papers in Economics no. 322, School of Business, Economics and Law, University of Gothenburg, 2008), p. 3; C. Richardson, *The Collapse of Zimbabwe in the Wake of the 2000-2003 Land Reforms* (Lewiston; Edwin Mellen, 2004).

⁷⁶ 'Police Probe NOCZIM', *Zimbabwe Independent*, 22 April 2005.

⁷⁷ 'Zimbabwe accused of misuse of Global Fund Money' *Afrol News*, 3 November 2008.

accounts of senior government officials. According to Transparency International, an anti-corruption organisation, Zimbabwe is among the most corrupt countries in the world⁷⁸.

While the aforementioned governance weaknesses have hurt Zimbabwe's economy and development efforts, restrictive measures have also led to economic problems. Those who argue that targeted sanctions have not hurt the Zimbabwean economy have hinged their argument on the premise that Zimbabwe is not under general or comprehensive sanctions⁷⁹. Comprehensive sanctions, such as those imposed on Rhodesia, apartheid South Africa and Iraq, included trade sanctions or embargoes designed to restrict the country's exports and imports. In Zimbabwe, no explicit trade embargoes have been imposed and countries that have imposed targeted measures have continued to trade with Zimbabwe. Both the USA and the EU have remained Zimbabwe's biggest trading partners after South Africa⁸⁰.

This argument neglects a number of important observations and facts. While the current restrictive measures have not imposed explicit financial or trade sanctions they have indirectly imposed restrictions on trade and access to foreign lines of credit⁸¹. Theoretically, the Zimbabwean government and Zimbabwean companies can borrow money or receive financial aid from both public and private entities from any part of the world. This explains why Zimbabwe has continued to receive ODA, financial aid and humanitarian assistance mainly via non-government organisations (NGOs), while some Zimbabwean-based companies have been able to acquire loans from international financial creditors.

The GNU will need US\$8.5 billion over the next two to three years to revive the country's economy⁸². However, IFIs, led by the IMF and the World Bank, suspended Zimbabwe's participation and ability to seek funding not for political reasons, but because of the country's inability to meet its obligations and repay the country's debts. IFIs have begun to change their policies and have begun re-engaging the GNU following the GPA. The World Bank, in particular, continues to provide both technical and analytical assistance focusing on macroeconomic policy, food security issues, social sector expenditures, social service delivery mechanisms and HIV/AIDS⁸³. It is unlikely that either institution will reinstate or fully engage Zimbabwe until there is an agreement over how to deal with the country's arrears⁸⁴.

⁷⁸ Transparency International, "Corruption Perceptions Index 2009," 2010; http://www.transparency.org/policy_research/surveys_indices/cpi/2009.

⁷⁹ Judy Smith-Höhn, "Zimbabwe: are targeted sanctions smart enough? On the efficacy of international restrictive measures," Institute for Security Studies, 4 June 2010, <http://www.iss.co.za/uploads/4Jun2010.pdf>; B. Bomba and W. Minter, 'Demystifying Sanctions and Strengthening Solidarity', *Pambazuka News*, Issue 477, 15 April 2010.

⁸⁰ EU-Zimbabwe trade totalled some US\$561 million in 2008, the last year for which full statistics are available, second only to the dominant role of South Africa with US\$2,650 million in trade with Zimbabwe. China followed with US\$267 million and the United States with US\$197 million. See B. Bomba and W. Minter, 'Demystifying Sanctions and Strengthening Solidarity', *Pambazuka News*, Issue 477, 15 April 2010.

⁸¹ Reserve Bank of Zimbabwe, 'Impact of Sanctions against Zimbabwe', Documented Presented to the Pan-African Parliament, *The Herald*, 8 November 2008.

⁸² "World Bank Still Has Not Resumed Lending to Zimbabwe," World Bank, 22 May 2009.

⁸³ World Bank Country Brief: Zimbabwe, <http://web.worldbank.org/WBSITE/EXTERNAL/COUNTRIES/AFRICAEXT/ZIMBABWEEXTN/0,,menuPK:375742~pagePK:141159~piPK:141110~theSitePK:375736,00.html>.

⁸⁴ IMF arrears are \$140 million, African Development Bank \$430 million, World Bank \$673 million.

The existing restrictive measures have managed to restrict the ability of the government, the major player in the Zimbabwean economy, and many other developing and underdeveloped economies, to access international credit and grants. The Zimbabwe Democracy and Economic Recovery Act (ZIDERA), for instance, does not explicitly impose sanctions on Zimbabwe but has provisions which affect the country's ability to access finance from international multilateral donors and US private commercial donors. The Act does not only empower the USA to use its voting rights and influence (as the main donor) in IFIs, such as the IMF, World Bank and the African Development Bank, to veto any applications by Zimbabwe for finance, credit facilities, loan rescheduling and international debt cancellation but also has some veiled threats against American companies and individuals found to be conducting business with individuals and entities with links to targeted individuals⁸⁵. While the decision by both the IMF and the World Bank to stop giving further loans to the Zimbabwean government was mainly based on Zimbabwe's failure to service its spiralling debt, it is not inconceivable that the US policy stance on Zimbabwe's access to international credit, expressed in ZIDERA, had a strong bearing on the decisions taken by those bodies to stop them from restructuring Zimbabwe's debt⁸⁶.

The impact of restrictive measures on the Zimbabwean economy has mainly been felt through their restrictions on the flow of both bilateral funding and ODA. A number of European development partners such as the governments of Sweden, Norway and Denmark who had since independence been the Zimbabwean government's critical partners in human development, either pulled out of Zimbabwe or decreased their operations in the country after their governments downscaled their government-to-government contacts with the Zimbabwean government. While the country continued to receive financial assistance in a number of areas, the amount of loan inflows extended to the government progressively declined.

While the levels of net aid, as a percentage of the GDP, largely remained constant due to economic decline, in absolute terms less aid has been provided while the need for it drastically rose due to government's financial constraints arising from the over 30 per cent decline in GDP between 1998 and 2004. The structure of aid also changed since 2000, with an increasing emphasis on integrated humanitarian relief, food security and health⁸⁷. Loan inflows declined to an average of US\$49.3 million between 2000 and 2006, compared to the previous decade when they increased from an average of US\$134.3 million in 1980s to US\$480.3 million in the 1990s. Grant inflows, declined significantly from an annual average of US\$138 million in the 1990s to US\$39.9 million registered between 2000 and 2006⁸⁸.

Although Zimbabwe was not aid dependent like Rwanda or Mozambique, where external donor support accounts for about half of the budget through General Budget Support funds, donor

⁸⁵ T. Hondora, "Zimbabwe Sanctions: Are they political or economic?" www.newzimbabwe.com, 21 September 2005.

⁸⁶ Despite the clearance of the critical General Resources Account (GRA) in February 2006, when Zimbabwe fully paid US\$210.6 million it owed the Fund, the IMF Board upheld sanctions on Zimbabwe.

⁸⁷ International Monetary Fund, *Zimbabwe: Selected Issues and Statistical Appendix* (IMF Country Report No. 05/359, October 2005), p.8.

⁸⁸ Reserve Bank of Zimbabwe, 'Impact of Sanctions against Zimbabwe', Documented Presented to the Pan-African Parliament, *The Herald*, 8 November 2008.

support had previously helped the government to meet many of its social and economic obligations in the 1980s and 1990s⁸⁹. Foreign aid accounted for 15 per cent of Zimbabwe's GDP by 1999, and helped the country achieve significant progress in key social indicators⁹⁰. For a country that has depended on external support both in the pre-independence and post independence eras, the withdrawal of support thus clearly aggravated the financial crisis in the country and affected the capacity of the government to deliver basic services to the population⁹¹.

Without fiscal budgetary support from IFIs and bilateral loans, Zimbabwe's budget deficit has had to be financed from the country's contracting domestic bank sources and over the years this has helped to push inflation. The same problem of limited balance of payment support has continued to threaten the performance of the Zimbabwean economy after the formation of the inclusive government. It is therefore not surprising that inflation has started to go up again after dropping to negative digits in the first few months of the inclusive government.

Restrictive measures and the withdrawal of bilateral support, alongside the country's political instability attributable to Zanu-PF⁹², are factors that have made Zimbabwe a high-risk business environment⁹³. As such, Zimbabwe has attracted high-risk premium on offshore lines of credit, and this often scares away creditors. As a result of the perceived risk premium, the few private companies and public enterprises that have managed to secure offshore funds have done so at high interest rates⁹⁴. Expensive credit has pushed the input and operational costs of Zimbabwean-based companies trying to recapitalise. As a result of all these factors, most Zimbabwean-based companies have often found themselves pricing themselves out of the market when competing with foreign-based firms with access to affordable capital loans, which has worked to the advantage of South African companies in particular.

Arguments persist that the economy of Zimbabwe has suffered from restrictive measures because the measures target both government and government officials in an economy where the government itself (either as a direct provider of services or a shareholder in public enterprises or parastatals) and the targeted officials are all major players in the economy. Many Zanu-PF leaders and securocrats have become serious players in the productive sectors of the economy, such as agriculture, mining, gaming and manufacturing; particularly during the last ten years of crisis, to an extent that they are now basically the business anchor class of the Zimbabwean post-

⁸⁹ See K. Ezemenari, et. al., 'The Fiscal Impact of Foreign Aid in Rwanda: A Theoretical and Empirical Analysis' *World Bank Policy Research Working Paper No. 4541* February 1, 2008; M.D. Lorenzo, 'The Rwandan Paradox: Is Rwanda a Model for an Africa beyond Aid?' *American Enterprise Institute for Public Policy Research*, 1 January 2008; P.D. Renzio and J. Hanlon, 'Contested Sovereignty in Mozambique: The Dilemmas of Aid Dependence' (Global Economic Governance Programme Working Papers 2007/25, January 2007).

⁹⁰ See USAID, Zimbabwe-Congressional Presentation FY 2000, 14 July 1999.
www.usaid.gov/pubs/cp2000/afr/zimbabwe.html.

⁹¹ M. Erikson, *Targetting the Leadership of Zimbabwe: A Path to Democracy and Normalization* (Uppsala University, Department of Peace and Conflict Research, 2007), p.22.

⁹² This includes the indigenisation law and continued land grabbing.

⁹³ See Magaisa, "Smart Sanctions: Who really do they hurt?"; Hondora, 'Zimbabwe Sanctions: Are they political or economic?'.

⁹⁴ Reserve Bank of Zimbabwe, "Impact of Sanctions against Zimbabwe", Documented Presented to the Pan-African Parliament, *The Herald*, 8 November 2008.

independence state⁹⁵. Given these Zanu-PF leaders' entrenchment in the economy, it would be naïve to assume that targeting these individuals and their business entities will not have ripple effects on the broader economy. For instance, many Zanu-PF leaders and senior commanders in the army, the police and intelligence targeted for sanctions all have major stakes in the agro-industrial sector. However, to counter the entrenchment of high-ranking Zanu-PF officials in this sector, property rights should be restored and coherent support and capacity building schemes for new farmers can be put into place in order to reignite the agro-driven economy and mitigate any effects of targeted restrictive measures on these individuals.

Some observers have stated that the broader implication of this is that the economic revival of the country, hinged on the revival of the pivotal agricultural sector, cannot uninterruptedly take place as long as targeted sanctions exist against these individuals. Equally, the economic revival cannot take place without the restoration of democracy, and the removal of the complex patronage systems that now run Zimbabwe. More seriously, it is doubtful that the new owners of the agricultural sector have the ability to revive it even with the removal of sanctions. Revival of the agricultural sector will require technical expertise, not validation of the new owners.

Direct and Indirect Impact of Restrictive Measures on Zimbabweans

While there might be debate about whether restrictive measures have been effective against the targeted individuals or not, ordinary Zimbabweans have been indirectly affected by the decline in ODA. The scaling down of ODA in the last few years has seriously affected many poor communities which have, since independence, relied on financial support from development partners like the UK, Denmark, Norway and Sweden. At the same time, the withdrawal of bilateral aid to the government, coupled with pillaging of some of the limited resources through corruption, has seriously undermined the government's capacity to deliver basic services like health and education to ordinary members of poor communities.

Humanitarian assistance for vulnerable communities has indeed been revived under the Humanitarian Plus programme. However, under the current restrictive measures, many of the Western development assistance organisations have preferred to focus on short-term humanitarian assistance rather than long-term development assistance and this intervention strategy has been less effective in helping communities deal with their chronic vulnerabilities⁹⁶.

Under the dollarised economy, Zimbabweans have benefited from the end of hyperinflation but many continue to struggle to survive because of the economy's limited takeoff. Availability of goods and services has significantly improved, and public sector employees have begun to return to their jobs⁹⁷. Dollar deposits in the banking system have grown rapidly, as has private credit. But businesses face serious difficulties as the costs of infrastructure and labour have increased and

⁹⁵ See J Muzondidya, "Our Guns are Our Votes": The Political-Military Alliance in Zimbabwean Politics and Prospects for Democratic Transition (AEGIS 3rd European Conference on African Studies, Leipzig, 4-7 June 2009).

⁹⁶ J. Muzondidya, *Zimbabwe Context Analysis for Oxfam's Strategic Planning Process*. (Consultancy Report for Oxfam Zimbabwe, March 2010).

⁹⁷ World Bank Country Brief: Zimbabwe,

<http://web.worldbank.org/WBSITE/EXTERNAL/COUNTRIES/AFRICAEXT/ZIMBABWEEXTN/0,,menuPK:375742~pagePK:141159~piPK:141110~theSitePK:375736,00.html>.

government subsidies have been withdrawn⁹⁸. Foreign investment has yet to seriously take root as the political environment continues to be unstable. Like many of the farm seizures, legislation like the Indigenisation and Economic Empowerment Act is likely to have benefited not the wider population but those individuals the government appoints to take control of the companies.

Opportunity Costs of Restrictive Measures

There are several dilemmas associated with the extension of restrictive measures. First, the continued imposition of measures against a partner of the GNU may hinder the ability of the GNU to attract international finance to revive the economy. With its capacity to attract international finance constrained by restrictive measures, the GNU's ability to introduce some economic and social reforms will continue to be limited. Most significantly, it negatively affects public perceptions about Zanu-PF's new partners in government, an outcome that Zanu-PF may have anticipated, whose capacity to govern or engineer social and economic changes some people have always doubted. Furthermore, the inability of the GNU to introduce meaningful social and economic changes in people's lives has the potential to increase social and economic tensions and conflicts.

Second, the continuation of restrictive measures gives Zanu-PF an excuse to blame all its failings on the West. Since the formation of the GNU, Zanu-PF has continued to blame the lack of economic progress in the country on economic "sanctions." While many Zimbabweans obviously do not believe Zanu-PF's attempts to absolve itself of the economic ruin of the country, there is an equally significant group of people who believe their propaganda on restrictive measures. In this sense, restrictive measures have been counterproductive and have provided Zanu-PF with cover.

Third, the continued imposition of restrictive measures has enabled Zanu-PF to cultivate political sympathy and support from the SADC, the AU and other Third World regional countries who are all sensitive to issues of Western hegemonic control. So far, the SADC has been critical of the EU and the US decision to maintain sanctions against the Zimbabwean government as detrimental to the movement towards a successful transition.

Fourth, the continued application of sanctions long after the introduction of the GNU strengthens the hand of the hardliners in Zanu-PF, who were opposed to the GNU from the onset, in opposition to their reformist counterparts⁹⁹. In the views of the hardliners, some of whom are seriously convinced that there is a Western imperialist plot against Zimbabwean nationalists, the GNU has not helped in any way to soften Western attitudes towards Zanu-PF and no amount of political accommodation of MDC demands will result in a change of political attitudes towards them. The danger with the ascension of the hardliners in Zanu-PF is that Zimbabwe risks descending into political and economic regression if they take control of both Zanu-PF and government because they will most likely close whatever limited political space was opening up and will consolidate their

⁹⁸ Praveen Kumar, "Can Zimbabwe Turn the Corner?" 31 August 2009, <http://blogs.worldbank.org/africacan/can-zimbabwe-turn-the-corner>.

⁹⁹ Zimbabwe Institute, *Beyond the False Deadlock: Policy Options for Resolving the Political Deadlock in Zimbabwe* (ZI Position Paper 1, June 2010); E. Masunungure, 'Zimbabwe: Country Context' (Paper Presented at Oxfam Planning, Harare, 9 November 2009).

hold over power through intensified repression¹⁰⁰. As this study will elucidate further on, evidence suggests that hardliners within Zanu-PF are preparing for a violent election through the revitalisation of militia bases, which has been witnessed during the current constitutional outreach process¹⁰¹.

Fifth, the selective application of restrictive measures, particularly travel restrictions, on members of the GNU has created complications in the functioning of the GNU. For instance, the decision to bar Zanu-PF cabinet ministers from certain joint cabinet trips they are supposed to undertake with their MDC counterparts, has often caused embarrassment and frustration for both the MDC and Zanu-PF and derailed government business. However, it should be reiterated that individuals with travel restrictions are allowed to attend international meetings. The selected application of restrictions has also created space for the MDC to exert influence and demonstrate their ability to allow Zanu-PF space¹⁰².

Similarly, the decision to bypass the government when providing funding to Zimbabwe or to fund selected government ministries, as currently practiced by some Western donors and suggested in the proposals for a reform of ZIDERA, creates not only problems for relations among the government and NGOs but friction and tension within the GNU. Funding certain government departments, particularly those controlled by the MDC, encourages Zanu-PF to regard this as an attempt to engender political support for the MDC through financial leverage. They will also regard such financial support as not only divisive but an attempt to manipulate MDC policies through financial muscle. Zanu-PF has thus far been hostile to humanitarian assistance channelled through NGOs and financial assistance through the Multi Donor Trust Fund (MDTF) because it views it as a continuation of the “regime change” agenda. The attempt to fund ministries selectively or side-step government in providing funding for humanitarian assistance and infrastructural development thus strengthens the hand of the hardliners in Zanu-PF who regard NGOs and the MDC as Trojan horses for Western imperialist interests. Yet until Gideon Gono no longer serves as the Governor of the RBZ, direct funding to the government of Zimbabwe is not a financially sound choice¹⁰³.

The Role of the Region and International Community

Effective enforcement of restrictive measures is limited by the level of coordination amongst members of the West and the SADC and all actors applying restrictive measures. The lack of international consensus was most visible within the United Nation’s Security Council in July 2008. Following the second round of presidential elections and the violence and intimidation that preceded it, the US proposed a resolution calling for an arms embargo, the appointment of a UN mediator, as well as targeted financial and travel restrictions against President Mugabe and 13 prominent military and government officials. South Africa publicly opposed the resolution claiming that the Security Council must let Africa solve its own problems and that the resolution would

¹⁰⁰ Zimbabwe Institute, *Beyond the False Deadlock: Policy Options for Resolving the Political Deadlock in Zimbabwe* (ZI Position Paper 1, June 2010); E. Masunungure, ‘Zimbabwe: Country Context’ (Paper Presented at Oxfam Planning, Harare, 9 November 2009).

¹⁰¹ Interview on 7 September 2010.

¹⁰² Interview on 7 September 2010.

¹⁰³ Interview on 7 September 2010.

engender an unbalanced mediation effort¹⁰⁴. When pushed to a vote, Russia and China exercised their vetoes, claiming that the Zimbabwe crisis was not a threat to international stability¹⁰⁵, along with votes against by South Africa, Libya and Vietnam¹⁰⁶.

The Commonwealth

Zimbabwe is a divisive issue for the Commonwealth. Western states, specifically the United Kingdom, Australia, Canada and New Zealand, have taken a hard line, resulting in the 2002 suspension of Zimbabwe's membership. Several African and other developing nations have campaigned for Zimbabwe's reinstatement, arguing that dialogue and engagement, not isolation, will encourage reform.

Clause 3(viii) of the Millbrook Commonwealth Action Programme provides for situations in which member states that violate the principles of the Commonwealth and choose to withdraw rather than abide by the Harare Declaration can have further bilateral and multilateral measure imposed on them¹⁰⁷. Measures to be taken include limiting government-to-government contact and people-to-people measures, among others. However, little concerted effort by the Commonwealth has taken place since Zimbabwe left. As one expert noted, Mugabe subverts the Commonwealth by getting SADC and AU countries to disregard their Commonwealth obligations. However, there seems not to be countervailing attempts by pro-democracy forces in the Commonwealth to apply pressure back¹⁰⁸.

South Africa and the Region

The legacy of colonialism and historical grievances has engendered sensitivity to what many developing countries, including African states, describe as Western interference. The policy of non-interference, a strictly adhered to policy of the AU's predecessor, the Organisation of African Unity, continues to resonate amongst many African states. Former colonies share resentment of being treated as second-class states. Malaysia's former Foreign Minister, Syed Hamid Albar, was quoted as saying, "There is a tendency among the white governments in the Commonwealth to tell us to do this and that. They must stop their colonial ways; stop dominating us in the Commonwealth¹⁰⁹."

Amongst African states, Botswana, Mozambique and Zambia have openly criticised the Mugabe government. Nevertheless, many African states continue to offer various measures of economic and political support, including offering lines of credit or loans and calling for restrictive measures to be revoked.

¹⁰⁴ Neil MacFarquhar, "2 Vetoes Quash U.N. Sanctions on Zimbabwe," *New York Times*, 12 July 2008, Online Edition, http://www.nytimes.com/2008/07/12/world/africa/12zimbabwe.html?_r=1.

¹⁰⁵ Ian Drury, "UK Condemnation as Russia and China Veto Sanctions on Zimbabwe's Mugabe Regime," *Daily Mail*, 12 July 2008, Online Edition, <http://www.dailymail.co.uk/news/worldnews/article-1034529/UK-condemnation-Russia-China-veto-sanctions-Zimbabwes-Mugabe-regime.html>.

¹⁰⁶ The resolution was supported by the United States, the United Kingdom, France, Belgium, Italy, Panama, Costa Rica and Burkina Faso.

¹⁰⁷ Millbrook Commonwealth Action Programme on the Harare Declaration, 12 November 1995, http://www.thecommonwealth.org/Internal/20723/34458/the_millbrook_commonwealth_action_programme/

¹⁰⁸ Interview 7 September 2010.

¹⁰⁹ "White-black clash over Zimbabwe," *The Tribune*, 7 December 2003, Online Edition, <http://www.tribuneindia.com/2003/20031207/world.htm>.

While South Africa is advocating for the lifting of sanctions and striving to achieve an international compromise, there remains no guarantee that Mugabe and Zanu-PF officials responsible for undermining the GPA will begin to work towards full implementation. South Africa and the SADC have not *specifically* noted what measures will be taken against Mugabe and Zanu-PF for non-compliance. South Africa's position is sensitive to Mugabe's support for the ANC's liberation movement against apartheid.

As recently as March 2010, President Jacob Zuma, on a state visit to the United Kingdom, noted:

- "...one part of the unity government, the MDC, can travel all they want, around the world and do what they want while the other part, Zanu-PF, cannot"¹¹⁰."
- "That's [sanctions] impeding the functioning of the unity government and so the international community that supported the power-sharing agreement must also lift the sanctions to allow the unity government to function to its full capacity"¹¹¹.

This position has not changed since 2008, when Zanu-PF, MDC-T and MDC-M were involved in negotiations. A SADC communiqué published in September 2009 noted, "... the progress made in the implementation of the GPA and called on the international community to remove all forms of sanctions against Zimbabwe"¹¹².

Since the implementation of the GPA in February 2009, South Africa, with the support of MDC-T, has attempted to find a common position with the international community. South Africa has consistently stated that sanctions on one half of the GNU engender internal divisions and have complicated problem-solving measures since members of the unity government are subjected to different operating procedures.

Mugabe has consistently stated that he will not make any concessions unless sanctions are lifted; recent reports also state concessions will not be made unless foreign broadcasts within Zimbabwe cease¹¹³; a new demand levelled by Zanu-PF. A report from the GNU detailing outstanding issues troubling the power-sharing arrangement was submitted to President Zuma on 11 June and is currently under consideration by Pretoria.

Zimbabwe has repeatedly flouted the mediation led by Mbeki, Zuma and the SADC. Most recently, on 16 July 2010, the government of Zimbabwe, for the third time, was found to be in contempt of the SADC Tribunal's ruling to make all possible efforts to return land seized illegally from South African farm owners in Zimbabwe¹¹⁴. Zimbabwe's government has refused to comply with previous

¹¹⁰ Elias Biryabarema, "Zimbabwe sanctions on Mugabe allies should go – Zuma," <http://www.reuters.com/article/idUSTRE62Q0M820100327>, 27 March 2010.

¹¹¹ Ibid.

¹¹² MopaneTree – The People's Place, "SADC communiqué: Kinshasha, DRC," <http://www.hellonam.com/press-releases-statements-reports/52008-sadc-communique-kinshasha-drc.html>, 11 Sep. 2009.

¹¹³ "Little Progress to Note as Zimbabwe Unity Partners Report to South Africa's Zuma," *Voice of America News*, <http://www1.voanews.com/zimbabwe/news/Zimbabwe-Principals-Report-to-Zuma-96152669.html>, 11 June 2010.

¹¹⁴ DA: Statement by Wilmot James, Democratic Alliance member of the SADC parliamentary forum, calling on President Zuma to take a stand against the Zimbabwean government, <http://www.polity.org.za/article/da-statement-by-wilmot-james-democratic-alliance-member-of-the-sadc-parliamentary-forum-calling-on-president-zuma-to-take-a-stand-against-the-zimbabwean-government-19072010-2010-07-19>, 19 July 2010.

rulings of the SADC tribunal and is challenging its very legitimacy and questioning Zimbabwe's commitment to the regional institution.

Such disregard has made it difficult for the international community to place its faith in the GNU and lift sanctions which, following the 2009 Kinshasa Summit, President Zuma stated should be lifted without conditions¹¹⁵. It has also complicated South African and SADC calls to lift sanctions when Zimbabwe is refusing to participate in regional institutions designed to defend the rule of law and foster international security. While South Africa is advocating for the suspension of sanctions for a period of 12 months leading to free and fair parliamentary and presidential elections, it seems to have lost its leverage to push the mediation forward.

South Africa's current ambivalence towards synchronising a response that is both accepted by the international community and the SADC threatens to constrain international compromise and a comprehensive international approach toward the suspension of sanctions.

South Africa and the SADC should work with the international community to implement an internationally acceptable and binding common position regarding suspension of sanctions and publicly set conditional benchmarks to denote progress that will lead to a total removal of restricted measures after peaceful free and fair elections and a successful transfer of power. South Africa must reconcile its democratic values and solidarity for a fellow liberation movement if the Zimbabwean crisis is not to become stale or further entrench all parties within intransigent and incompatible positions.

The EU and United States have embarked on initiatives to revise their respective strategies as a response to the GPA. For example, following a high-level meeting between the EU and Zimbabwe in Brussels in July 2010, the EU established a provision that the persons and companies on their restrictive measures list can apply to individual EU member states to attain authorisation to access the frozen assets¹¹⁶. This could be used as a means to identify Zanu-PF reformers who are willing to embrace democratic ways. As such, it is widely believed and accepted that the success and failures of the GPA and the GNU will be associated with the MDC as they are the ones who have the mandate from the people. For every failure, the MDC is spending political capital that they need to retain for future elections. Even though a recent poll conducted by the Mass Public Opinion Institute revealed that approximately ten per cent of adults polled would vote for Mugabe, Zanu-PF's refusal to implement the GPA because of restrictions is harming the reputation of the MDC¹¹⁷.

To maintain regional and international support, a senior member of the South African government stated that Tsvangirai needs a deal with the international community to address the issue of

¹¹⁵ Zimbabwe sanctions "should end," *BBC News*, 9 September 2009, Online Edition, <http://news.bbc.co.uk/2/hi/africa/8245286.stm>.

¹¹⁶ "Zim/EU re-engagement talks: The facts," *The Zimbabwean*, 28 July 2010, Online Edition, http://www.thezimbabwean.co.uk/index.php?option=com_content&view=article&id=33073:zimeu-reengagement-talks-the-facts&catid=31:weekday-top-stories&Itemid=30.

¹¹⁷ Lance Guma, "New Survey Shows Mugabe has Lost Support," *SW Radio Africa*, 24 August 2009, Online Edition, <http://www.swradioafrica.com/news240809/survey240809.htm>.

sanctions¹¹⁸. The official continued to posit that South Africa is amenable to the conditional lifting of restrictive measures if Zimbabwe's internal actors can agree on a roadmap that will put the country on a stable and democratic path. We propose that the conditional lifting of sanctions should be tied to specific benchmarks that will constitute such a roadmap for Zimbabwe.

Moving Forward and Possible Consequences

According to many of those interviewed from both Zanu-PF and the MDC, restrictive measures have not worked as Zanu-PF continues to obstruct the GPA. The restrictive measures currently in place have thus failed to change the behaviours of those targeted; although political reforms have been achieved and must be recognised. In an interview with Zimbabwean Prime Minister Morgan Tsvangirai, he stated that the review of restrictive measures must consider the progress that has been achieved by the GNU, but, and most critically, restrictive measures must be linked to the broader goal of free and fair elections followed by a smooth transfer of power for whichever party wins the election¹¹⁹.

The lack of a consensus among the West, the SADC (including South Africa) and the Zimbabwean internal actors has undermined all measures in place. Observers conclude that a lack of cooperation by Zanu-PF will continue amid low-levels of violence and with little attempt to build the capacity of a GPA mandated Zimbabwe Electoral Commission, Human Rights Commission and Media Commission. As with the current constitutional reform process, credible reports of intimidation and violence, the *modus operandi* of Zanu-PF, has commenced¹²⁰. Observers posit that Zanu-PF has two main goals, the removal of targeted sanctions and the winning of an election at a time of their own choosing¹²¹.

The GPA and restrictive measures have successfully deprived destabilising elements of some resources that could be utilised for undemocratic means. However, Zanu-PF has a monopoly on the use of force; the army, the police, the Central Intelligence Organisation (CIO) and the Joint Operation Command (JOC). Zanu-PF controls informal resources including the war veterans and various youth militias, as well as those benefiting from the "land reform" process, with an estimated 150,000 families "under direct, coercive patronage"¹²².

There are approaches that the international community can consider in regard to the political and economic situation in Zimbabwe. Each carry consequences that could alter the current power-sharing dynamics within the GNU. We have identified three options that can be taken by the international community: maintain the status quo, an unconditional removal of restrictive measures, and the calibrated removal of restrictive measures tied to six benchmarks.

¹¹⁸ Interview, South African official on 12 August 2010.

¹¹⁹ Interview, Morgan Tsvangirai on 27 July 2010.

¹²⁰ For more information, please see: Jonga Kandemiiri and Patience Rusere, "Zimbabwe Constitution Process Resumes After war Veterans Leader Sibanda Leaves Masvingo," *Voice of America*, 11 August 2010, Online Edition, <http://www1.voanews.com/zimbabwe/news/Zimbabwe-Constitution-Process-Resumes-After-war-Veterans-Leader-Sibanda-Leaves-Masvingo-100451654.html>; Alex Bell, "ZANU PF intimidation over new constitution continues," *SW Radio Africa*, 5 July 2010, <http://www.swradioafrica.com/news050710/Zanupf050710.htm>.

¹²¹ Research and Advocacy Unit, "What Are the Options for Zimbabwe? Dealing with the Obvious!" 4 May 2010.

¹²² Piers Pigou, "Zimbabwe's Transition: Fact or Fantasy?" *The Thinker* 17 (2010): 39.

Option 1: Maintain the Status Quo

Maintaining the status quo would do little, if anything, to encourage further concessions from Zanu-PF or assist in acquiring additional gains within the GPA. Zanu-PF has successfully framed the sanctions debate within the context of Western neo-colonialism and imperialism. Maintaining the current restrictions will allow Zanu-PF to continue to blame the GNU's weaknesses and inadequacies on the West and their sanctions. The MDC will continue to struggle to be perceived as an equal partner within the GNU while risking the perception among ordinary Zimbabweans of being unable to sufficiently govern and make good on election promises.

The West could consider sanctioning members of the MDC-T and MDC-M who are found to be committing similar abuses to those currently under sanction in an effort to show a commitment to democratic values and detract from claims of bias that are consistently sounded by Zanu-PF.

There are further potential political consequences. The current sanctions do not allow for sufficient buy-in from members of the SADC, particularly Zimbabwe's influential neighbouring countries Botswana, Mozambique and South Africa, and the MDC. If sufficient space is not created, nor the opportunities for SADC members to have a greater stake in determining progress and whether certain restrictions should be removed or maintained, the status quo could produce intractable positions among Zimbabwean political parties, members of the SADC, South Africa and the West.

Finally, as this option will most likely prolong the stalemate between Zanu-PF, MDC-M and MDC-T, the risk of an early election to establish a strong mandate for governance and legitimacy is high. Given the current polarisation within Zimbabwe, as well as the inability of the government to guarantee free and fair elections and ensure security, as well as the contradictory statements by senior commanders within the military regarding their political intentions, a call for elections is likely to engender a violent environment similar to that in the run-up to the 2000 and 2008 elections.

Option 2: An Unconditional Removal of Restrictive Measures

Secondly, the international community can call Mugabe and Zanu-PF's bluff and completely lift all restrictive measures. This would remove any obstacles to the implementation of the GPA, as claimed by Mugabe and Zanu-PF, and levy regional and international pressure on Zanu-PF to act in accordance with its responsibilities and obligations within the GNU. However, during interviews with senior politicians and politburo members, interviewees on occasion remarked that when sanctions are removed Zanu-PF will continue to blame Zimbabwe's problems on sanctions and those who imposed them¹²³. Based on our interviews, we find it unlikely that Zanu-PF will undertake real steps toward implementation of the GPA and will continue to find scapegoats as an excuse for intransigence and obstruction of their responsibilities within the GNU.

Even if sanctions are completely lifted, it is highly unlikely that significant re-engagement would commence with international donors. Development progress will take time. It would be unlikely that the Ministry of Finance would be able to meet its obligations. Zimbabwe's debts with the IFIs would still need to be addressed before new loans will be approved. While the Ministry of Finance has achieved impressive reforms, greater reforms need to be undertaken within the RBZ to ensure that

¹²³ Interview with senior Zanu-PF official on 25 August 2010.

there are mechanisms in place to make sure that certain resources are utilised properly.

Political consequences of a blanket lifting of restrictive measures could be as severe as maintaining the status quo. First, international implications could be the perception among Zimbabweans and the SADC of the West as both weak and lacking in political will towards Zimbabwe. Lifting restrictive measures would jeopardise credibility, already seen by some in the lack of coordination among the West, and would diminish the West's bargaining power and status.

Unlike Iraq, Cuba and North Korea, the restrictive measures on Zimbabwe represent a relatively new international strategy of punishing specific people who have committed egregious atrocities and ensuring that there is not a culture of impunity. The restrictive measures on Zimbabwe have set a precedent for other leaders and persons in a position of state power who commit similar abuses.

Lifting restrictive measures without sufficient progress would empower Zanu-PF, weaken the ability to level the playing field among the internal parties and stymie the process of democratisation. Zanu-PF's monopoly on state media and its menacing behaviour toward independent media are likely to encourage conditions that will allow for a perception that victory has been won over the "imperialists" and "colonialists". Since the implementation of the GPA, Zanu-PF has shown little goodwill. The MDC, which has publicly called for the lifting of restrictive measures in accordance with benchmarks, would be perceived as not having the support of the international community. Additionally, there could be a risk that the SADC could distance itself further from Zimbabwe and begin pushing an agenda that will see Zimbabwe manage its own affairs¹²⁴.

Option 3: The Calibrated Removal of Restrictive Measures

We recommend a process that calls for the calibrated removal of restrictive measures tied to six benchmarks: a credible voters' roll, an independent electoral commission, media freedom, a constitutional reform process, a land audit and security sector reform, all in cooperation with the SADC vis-à-vis South Africa. We believe that this option will engender the most agreement among stakeholders.

Benchmark 1: A Credible Voters' Roll

A revised voters' roll is a necessity. According to senior government officials within the MDC and Zanu-PF, a constitutional referendum is likely to be held in late 2010 or early 2011 with presidential and general elections taking place following the referendum in 2011.

The voters' roll is widely believed to be highly inflated. Jan Raath noted that, in 2005, the MDC was able to get hold of CDs of the voters' rolls for 12 constituencies, subject them to digital analysis and determined that 45 per cent of the names on the list were false¹²⁵. The voters' roll must be entirely redrawn up by non-partisan local and international professionals before the constitutional referendum takes place. Control over the voters' roll must be held by a fully independent electoral

¹²⁴ Interview on 7 September 2010.

¹²⁵ Jan Raath, "President Robert Mugabe 'raises the dead' to secure electoral victory in Zimbabwe," *The Sunday Times*, 18 March 2008, Online Edition.

commission if any future roll is not to be compromised¹²⁶. Zimbabwe and the international community should look to Kenya as an example of how to embark on a revising the voters' roll. Kenya successfully registered approximately 12 million voters in less than six months.

Benchmark 2: An Independent Electoral Commission

Zimbabwe needs a non-partisan, independent electoral commission which will ensure the credibility of electoral monitors and the voters' roll, permit fair campaigning of political parties, accredit media and other groups to monitor on the day of the election and analyse the entire process as a whole. Both the constitutional referendum and the next presidential and general elections are highly dependent on this body.

Currently, the electoral commission will be limited in its powers to change the process and presidential powers cannot be allowed to change electoral rules and regulations. Changes in the Electoral Act have to be passed by Zanu-PF Justice Minister Patrick Chinamasa.

Long-term election observers should be present, as they were in Nepal, Sudan and Kenya. Although the 2008 elections were deemed free and fair by the SADC electoral monitors, observers from the USA, EU, UK and other "critical" observer missions were strikingly absent from the few teams permitted to observe the 2008 elections. Additionally, domestic observers must be allowed to participate and have the same unfettered access as international observers. In order for the next election to be named free and fair it will be important to include observer missions from the abovementioned states and organisations to support the call of the election, if it is deemed to be so.

Benchmark 3: Media Freedom and the Establishment of a National and Independent Radio Station

Advocates for free speech and an independent media experienced a breakthrough when the GNU, in May 2010, awarded licences to four independent daily newspapers¹²⁷. Consequently, it is essential that efforts to control the media, as occurred in the past decade, to maintain authoritarian rule do not re-emerge under the pretext of media reform. Government ownership of the press typically has a negative effect on citizens' rights, corruption, weaker security of property as well as a lower quality of regulation, with health outcomes such as life expectancy, infant mortality and malnutrition also found to be worse in countries where the government owns the media outlets¹²⁸.

According to Chavunduka, the media seek a level playing field where the rules and regulations are clearly stated and the laws are fair; and where they do not impose unnecessary restrictions on the media's ability to report on matters of national interest, whether they concern events in public institutions or the private lives of public officials¹²⁹.

¹²⁶ For more information, please see: Derek Matyszak, "2013 Vision – Seeing Double and the Dead. A preliminary Audit of Zimbabwe's Voters' Roll". Research and Advocacy Unit, September 2009.

¹²⁷ Phil Han, 'New newspapers to launch in Zimbabwe', CNN, 29 May 2010, <http://edition.cnn.com>.

¹²⁸ Chris Greene, *The Impact of Radio on Political Change: A practitioner Perspective in Building Communication Opportunities*, p 20.

¹²⁹ Mark G Chavunduka. 'The Role of the Media in Zimbabwe' in *The right to tell: the role of Mass Media in Economic Development*. BCO Impact Assessment Study, June 2008, p. 289.

The government needs to eliminate the draconian laws that unnecessarily infringe upon the operation of the press including:

- The Access to Information and Protection of Privacy Act, which prevents media organisations from hiring unaccredited journalists;
- The Public Order and Security Act which has been widely used to prosecute critics of the president, his government and policies; and
- The Broadcasting Services Act, which sets such complex requirements for registering broadcast media that the government-controlled Zimbabwe Broadcasting Corporation remains the only station on the airwaves.

Under the terms of the power-sharing agreement, as one of the four new Constitutional Commissions, the Zimbabwe Media Commission (ZMC) was set up in December 2009 to address issues of licensing of new press, radio and TV¹³⁰. Tafataona Mahoso from the repressive but now defunct Media and Information Commission has been retained as chief executive of the ZMC, which raises the question as to whether or not the new commission will in fact be effective. The retention of Mahoso is especially worrisome since he oversaw the closure of a four newspapers in a decade. Some media monitoring groups have criticised the decision to retain Mahoso, stating that it is a veiled attempt by Zanu-PF to keep control over the media¹³¹.

The establishment of an independently operating national FM radio station is widely regarded as a real litmus test that can be used to publicly demonstrate Zanu-PF's commitment to the GPA¹³². Radio is the main source of information for Zimbabweans¹³³. The main impact for social change, identifiable in community radio stations, is that they are much more participatory and democratic. The ability to communicate is a qualitative indicator of the highest relevance¹³⁴.

Benchmark 4: Constitutional Reform Process

The constitutional reform process is the second to take place in a decade. The Kariba Draft, notable for allowing the government to seize land without compensation and the entrenchment of executive power, was defeated by a referendum in 2000. Similar to the Kariba process, an outreach programme has been conducted nationwide to gauge the concerns of citizens and incorporate their input into a new constitutional draft to stand before a new referendum. Minister of Constitutional and Parliamentary Affairs Minister Eric Matinenga noted that the constitutional

¹³⁰ Claire Furphy, 'Press Freedom in Zimbabwe: A tool for democratic change and development must not be abused', Wednesday, 16 June 2010
http://www.consultancyafrica.com/index.php?option=com_content&view=article&id=434:press-freedom-in-zimbabwe-a-tool-for-democratic-change-and-development-must-not-be-abused-&catid=57:africa-watch-discussion-papers&Itemid=263.

¹³¹ Claire Furphy, 'Press Freedom in Zimbabwe: A tool for democratic change and development must not be abused', Wednesday, 16 June 2010.

¹³² Interview with Tony Reeler on 6 August 2010

¹³³ "Zimbabwe country profile," *BBC News*, 16 June 2010,
http://news.bbc.co.uk/2/hi/africa/country_profiles/1064589.stm.

¹³⁴ Chris Greene, *The Impact of Radio on Political Change: A practitioner Perspective in Building Communication Opportunities*, p 22.

outreach component of the process is the most important.

According to a senior MDC official, the constitutional outreach process should be completed in September 2010 with general elections likely to take place in 2011. A new constitution is a clear deliverable. However, the country is highly polarised at the present with reports of violence and intimidation taking place. The current atmosphere is not conducive to creating a “perfect document”¹³⁵. Rather, it is more likely that a new constitution will lead to a revised document at a later date¹³⁶. Nevertheless, the international community, through direct government-to-government contact and nongovernmental organisations, should offer technical support with the aim of including an encompassing Bill of Rights and separation of powers within the new draft. Levels of violence should continue to be monitored during the outreach process and beyond.

It is imperative for a credible voters’ roll and independent electoral commission with the proper technical skills to be in place *before* a constitutional referendum takes place. Steps should also be taken to reduce the presence of police and military at polling stations; a move that has already been rejected by Police Commissioner-General Augustine Chihuri¹³⁷.

Benchmark 5: Land Audit

A two-year land audit that was scheduled to begin in early 2010 was threatened and blocked by Zanu-PF and the War Veterans. Mugabe has consistently argued that he is righting the wrongs of the colonial era in which land policies were discriminatory and land distribution was unequal. Mugabe and Zanu-PF have boxed the land issue within the context of Western imperialism and neo-colonialism. As Mkodzongi posits, “An unfortunate outcome...has been the trivialisation of the land issue; land occupations have been depicted as simple acts of political gimmickry; landless peasants who occupied these farms have been branded as agents of agrarian and environmental destruction, and are often considered to be in service to the ‘evil’ regime of Robert Mugabe”¹³⁸.

Minister of Lands and Land Resettlement Hebert Murerwa posited that the audit would assess activities on the ground, land uptake, production levels, availability of water sources and other related issues¹³⁹. The European Commission has offered to fund the audit, and insists the process should be “inclusive, transparent and comprehensive”¹⁴⁰. The composition of any land commission needs to consist of local, regional and international experts to achieve widespread legitimacy. The appointment of an international mediator should be considered. Former UN Secretary General Kofi Annan’s mediation in Kenya’s power-sharing deal following the 2007 crises should be used as a paradigm.

¹³⁵ Interview with a government Minister.

¹³⁶ Interview with a government Minister.

¹³⁷ Farai Mutsaka, “Chihuri opposes electoral reforms,” *Zimbabwe Independent*, 13 August 2010, Online Edition, <http://www.theindependent.co.zw/local/27587-chihuri-opposes-electoral-reforms.html>.

¹³⁸ Grasian Mkodzongi, “Land Reform is Common Sense,” *All Africa.com*, 11 March 2010, Online Edition, <http://allafrica.com/stories/201003111058.html>.

¹³⁹ Faith Zaba, War Vets to Block Land Audit,” *Zimbabwe Independent*, 14 January 2010.

¹⁴⁰ Alex Bell, “Shock As Mugabe Set to Handpick Land Audit Team,” SW Radio Africa, 26 May 2010; See also: An Overview of EU-Zimbabwe Relations, May 2010, http://www.delzwe.ec.europa.eu/en/whatsnew/overview%20of%20EU_Zimbabwe%20Relations%20May.pdf.

According to a Zimbabwean Minister, the role of the courts in land disputes should be strengthened. While this will inevitably require greater reform, one immediate step is to repeal Amendment 17.

Lastly, in 2008 and 2009, the SADC Tribunal in Namibia ruled in favour of white Zimbabwean farmers and against Zimbabwe's forced land evictions. Having refused to comply with the ruling, Zimbabwe challenged the legality of the Tribunal. Alarming, the SADC summit in August 2010 decided to review the role and functions of the Tribunal, a decision that could reverse some of the Tribunal's rulings. The decision will signal how much political capital SADC members are willing to vest in Zimbabwe.

Benchmark 6: Preliminary Security Sector Reform

The real issue, according to Prime Minister Tsvangirai, is the "power paradigm;" in other words, the smooth and peaceful transfer of power should Zanu-PF lose in the next elections. Restrictive measures must be used to get those in Zanu-PF to accept the will of the people. Security sector reform remains the most potentially destabilising and outstanding issue to be addressed by the GNU. An arms embargo was first implemented by the UK, shortly after the discovery of a hit list in which 1,500 farmers of British descent were targeted for forced land seizures¹⁴¹. The embargoes were ill-informed as they had forced those within the security sector to further embed themselves with Zanu-PF whose members had come under similar restrictions¹⁴². There has been no movement towards implementing security sector reforms aspects captured in the GPA.

In 2009, the National Security Council (NSC) was established to replace the Joint Operations Command (JOC) and to supervise the army, police and central intelligence agencies. The Council should have brought each of these entities into a greater public and political forum. However, the JOC runs parallel to the NSC and no substantive issue has been brought before the NSC to date.

The West should position themselves behind South Africa, as a member of the SADC, to drive forward the issue of genuine security sector reform. For example, Mbeki sent a delegation of generals to Zimbabwe in 2008 to assess the role of the security forces in political violence and to determine how the forces could eventually be reformed¹⁴³. The West should encourage South African President Zuma to send a similar delegation to build on Mbeki's previous initiative. Chief South African facilitator, Mac Maharaj, should be encouraged to see that the JOC is dismantled. Additionally, the West should motivate the SADC, vis-à-vis South Africa, to devise a role for Mac Maharaj, or a person of similar stature and knowledge of Zimbabwe, to attend NSC meetings to monitor progress and facilitate solutions to matters that arise. Finally, security forces need to disengage from the electoral processes; in particular individuals with security sector ties should be removed from the Electoral and Constitutional Commissions.

¹⁴¹ Judy Smith-Höhn, "Zimbabwe: are targeted sanctions smart enough? On the efficacy of international restrictive measures," Institute for Security Studies, 4 June 2010, <http://www.iss.co.za/uploads/4Jun2010.pdf>.

¹⁴² Interview on 4 August 2010.

¹⁴³ Erika Gibson, "Mbeki sends generals to Zim," *News24*, 12 May 2008, <http://www.news24.com/SouthAfrica/Politics/Mbeki-sends-generals-to-Zim-20080512>.

Conclusion

It is crucial that countries within the EU, the United States, Norway, Switzerland, Australia and New Zealand reach a common strategy on any future movement in regard to restrictive measures and engage those countries that flout the restrictive measures. Equally important is the Commonwealth's role, particularly with its North-South membership and the participation of member states within the SADC, the AU and the UN. Zanu-PF has and will notice cracks within the international community and is likely to try to exploit any policy discrepancies as it tried to do when former Swedish Ambassador to Zimbabwe, Sten Rylander, stated, "I am disappointed that I have to leave with most of the restrictive measures still in place"¹⁴⁴.

There has been a shift in policy toward Zimbabwe by the international community. Restrictive measures have been eased on some individuals and the USA is currently considering two bills: ZDERA 2010¹⁴⁵ to replace ZIDERA as well as the Zimbabwe Sanctions Repeal Act of 2010 that seeks to end directives for the USA to oppose and vote against any extension of loans, credit or guarantees to the Government of Zimbabwe as well as any debt cancellation or reduction owed by the Government of Zimbabwe to the United States or any international financial institution¹⁴⁶. The EU continues high-level delegation visits aimed at the renormalisation of relations, and countries have formed a Friends of Zimbabwe to assist Zimbabwe in its transformation. Re-engagement between Zimbabwe and the West must be coordinated with the GNU participants and with South Africa. Tying benchmarks to restrictive measures will reaffirm the international community's commitment to Zimbabwe's political and economic well-being and maintain a degree of influence over the country's transformation.

¹⁴⁴ "Sweden Breaks Ranks Over EU Sanctions," *New Zimbabwe*, 18 August 2010, Online Edition, <http://www.newzimbabwe.com/news-3083-Sweden%20breaks%20ranks%20over%20EU%20sanctions/news.aspx>.

¹⁴⁵ For more information, please see: <http://thomas.loc.gov/cgi-bin/query/z?c111:S.3297>.

¹⁴⁶ U.S. Senator James Inhofe, "Inhofe Introduces Zimbabwe Sanctions Repeal Act," http://inhofe.senate.gov/public/index.cfm?FuseAction=PressRoom.PressReleases&ContentRecord_id=43e5ac81-802a-23ad-4866-6e92cdfb6fca, 5 August 2010; For more information, please see: <http://thomas.loc.gov/cgi-bin/query/z?c111:S.3722>.

Appendix A: Methodology

This study incorporated semi-structured interviews with key members of the GNU, the South African government, *corps diplomatique* and members of civil society in both Zimbabwe and South Africa. Research was gathered from secondary sources, including journals, studies, statistics and second hand accounts to address the aforementioned objectives of this study.

List of interviews:

For the sake of confidentiality and security, a list of interviews can be provided upon request.

Appendix B: Current restrictive measures in place as of 1 September 2010

AUSTRALIA

INDIVIDUALS

1. ABU BASUTU, Titus M J, Air Vice Marshal
2. BIMHA, Michael Chakanaka, Chairman, Air Zimbabwe
3. BONYONGWE, Happyton, Director-General, Central Intelligence Organisation
4. BONYONGWE, Willa or Willia, Chair Securities Commission
5. BUKA, Flora, Minister of State for Special Affairs in the President's Office responsible for Land and Resettlement Programmes
6. BVUDZIJENA, Wayne, Assistant Police Commissioner
7. BVUTE, Ozias, CEO/Managing Director, Zimbabwe Cricket
8. CHAIRUKA, Annie Flora Imagine
9. CHAPFIKA, David, Deputy Minister of Agriculture
10. CHAPFIKA, Abina
11. CHARAMBA, George, Permanent Secretary, Department for Information and Publicity
12. CHARAMBA, Rudo Grace
13. CHARUMBIRA, Fortune Zefanaya, President of the Council of Chiefs and former Deputy Minister for Local Government, Member of Parliament & Zanu-PF Central Committee Member
14. CHAWE, McLoud
15. CHAWOTA, David, Acting CEO, Civil Aviation Authority, Zimbabwe
16. CHIDARIKIRE, Faber, Governor of Mashonaland West
17. CHIDHAKWA, Walter, Chairman, Tel-One
18. CHIDYAUSIKU, Godfrey, Chief Justice, Supreme Court
19. CHIGARU, Daniel John, Chairman, ZimTrade
20. CHIGUDU, Tinaye Elisha, Former Provincial Governor, Manicaland
21. CHIGWEDERE, Aeneas Soko, Provincial Governor, Mashonaland East; Former Minister of Education, Sports and Culture
22. CHIHOTA, Phineas, Deputy Minister of Industry and International Trade
23. CHIHURI, Augustine, Police Commissioner-General
24. CHIHURI, Isobel or Isabel Halima
25. CHIKAURA, Charles, CEO Zimbabwe Development Bank; Chairman, Grain Marketing Board
26. CHIMBUDZI, Alice, Zanu-PF Politburo Committee Member
27. CHIMEDZA, Paul, Dr
28. CHIMUTENGWENDE, Chenhamo Chakezha, Minister of State for Public and Interactive Affairs
29. CHINAMASA, Patrick Anthony, Minister of Justice, Legal and Parliamentary Affairs
30. CHINAMASA, Monica
31. CHINDORI-CHININGA, Edward, Former Minister of Mines and Mining Development
32. CHINGOKA, Peter, Head of Zimbabwe Cricket
33. CHINOTIMBA, Joseph, Deputy Chairman, Zimbabwe National Liberation War Veterans Assoc
34. CHIPANGA, Tongesai Shadreck, Former Deputy Minister of Home Affairs
35. CHIPATO, Charles, Chairman, National Oil Company of Zimbabwe
36. CHIPWERE, Augustine, Colonel
37. CHIREMBA, Mirirai, Reserve Bank of Zimbabwe (RBZ) Financial Intelligence

- Unit Chief, Reserve Bank of Zimbabwe (RBZ)
38. CHITEPO, Victoria, Zanu-PF Politburo Committee Member
 39. CHIVAMBA, Kizito, Zanu-PF Provincial Chair, Midlands
 40. CHIWENGA, Constantine, Lt Gen, Commander Zimbabwe Defence Forces
 41. CHIWENGA, Jocelyn Mauchaza,
 42. CHIWESHE, George, Chairman, Zimbabwe Electoral Commission
 43. CHIWEWE, Willard, Former Provincial Governor, Masvingo
 44. CHIYANGWA, Philip, Former Zanu-PF Provincial Chairman, Mashonaland West
 45. CHOMBO, Ignatius Morgan Chiminya, Minister of Local Government, Public Works and Urban Development, Zanu-PF Politburo Member, Secretary of the Politburo Committee on Lands and Resettlement
 46. CHOMBO, Ever
 47. CHOMBO, Marian
 48. CHURU, Zvinechimwe, CEO, NOCZIM
 49. DAMASANE, Abigail, Deputy Minister for Women's Affairs, Gender and Community Development
 50. DEKETEKE, Pirirayi, Chairman, Broadcasting Authority of Zimbabwe
 51. DINHA, Advocate Martin, Governor of Mashonaland Central
 52. DOKORA, Lazarus, Deputy Minister of Higher and Tertiary Education
 53. DUBE, Tshinga Judge, CEO, Zimbabwe Defence Industries; Retired Colonel
 54. FUNDIRA, Emmanuel, Former Chairperson, Zimbabwe Tourism Authority
 55. GAMBE, Theophilus Pharoah, Zimbabwe Electoral Commissioner
 56. GATA, Sydney, Former Chairman, Zimbabwe Electricity Supply Authority
 57. GEORGIAS, Aguy, Senator, Deputy Minister of Economic Development
 58. GOCHE, Nicholas, Minister of Public Services, Labour and Social Welfare, and Zanu-PF Politburo Secretary for National Security
 59. GONO, Gideon, Governor, Reserve Bank of Zimbabwe (RBZ)
 60. GONO, Hellin Mushanyuri
 61. GOWO, Alois, A/g CEO, ZISCO
 62. GULA-NDEBELE, Sobuza, Former Attorney-General
 63. GUMBO, Rugare Aleck Ngidi, Minister of Agriculture (former Minister of Economic Development) and Zanu-PF Politburo Deputy Secretary for Administration
 64. GURIRA, Cephas T, Colonel
 65. GWEKWERERE, Stephen, Colonel
 66. HOVE, Richard, Zanu-PF Politburo Secretary for Economic Affairs
 67. HUNGWE, Josaya Dunira, Former Provincial Governor, Masvingo
 68. HUNI, Munyaradzi, journalist, 'Zimbabwe Herald'
 69. JANGARA, Thomsen Toddie, ZRP Chief Superintendent for Harare South
 70. KACHEPA, Newton, MP elect for Mudzi North
 71. KACHINGWE, Sarah, Commissioner, Zimbabwe Electoral Commission
 72. KADZURA, Jonathan, Vice Chairman, Air Zimbabwe
 73. KAHARI, George Payne, Commissioner, Zimbabwe Electoral Commission
 74. KANGAI, Kumbirai, Zanu-PF Politburo Secretary for External Affairs
 75. KARAKADZI, Mike Tichafa, Air Vice Marshal
 76. KARIMANZIRA, David Ishemunyoro Godi, Provincial Governor, Harare Metropolitan; Zanu-PF Politburo Secretary for Finance
 77. KASEKE, Karikoga, Chairman of the Zimbabwe Tourism Authority
 78. KASUKUWERE, Saviour, Deputy Minister of Youth Development and Employment Creation; Zanu-PF Politburo Deputy-Secretary for Youth Affairs
 79. KAUKONDE, Ray Joseph, Former Provincial Governor, Mashonaland East

80. KAZEMBE, Joyce, Deputy Chair, Zimbabwe Electoral Commission
81. KEREKE, Munyaradzi, Principal Advisor to RBZ Governor Gideon Gono
82. KHUMALO, Sibangumuzi M (Sixton), Brigadier General
83. KURASHA, Prof Jameson, Chairman, Zimbabwe Post Ltd
84. KURUNERI, Christopher Tichaona, Former Minister of Finance and Economic Development
85. KWAINONA, Martin, Assistant Commissioner, Zimbabwe Police
86. KWENDA, R, Major
87. LANGA, Andrew, Deputy Minister of Environment and Tourism
88. LESABE, Thenjiwe, Zanu-PF Politburo Member
89. MABUNDA, Musarahana, Assistant Police Commissioner, Officer Commanding Law and Order division
90. MACHAYA, Jaison Max Kokerai, Provincial Governor, Midlands, Former Deputy Minister of Mines and Mining Development
91. MADE, Joseph Mtakwese, Minister of State for Agricultural Engineering and Mechanisation (former Minister of Agriculture and Rural Development)
92. MADE, Patricia A
93. MADZONGWE, Edna, President of the Senate and Zanu-PF Politburo Deputy Secretary for Production and Labour
94. MAFA, David John, Zanu-PF Provincial Chairman, Mashonaland West
95. MAHOFA, Shuvai Ben, Former Deputy Minister for Youth Development, Gender and Employment Creation
96. MAHOSO, Tafataona P, Chair, Media Information Commission
97. MAKAMURE, Wellington, Managing Director, Tel-One
98. MAKONYERE, Shepherd, Acting Chairman of Agri-Bank (Agriculture Bank of Zimbabwe)
99. MAKWAVARARA, Sekesai, Former Mayor of Harare (Zanu-PF)
100. MALINGA, Joshua, Zanu-PF Politburo Deputy Secretary for Disabled and Disadvantaged
101. MALULEKE, Titus Hatlani, Provincial Governor, Masvingo, Former Deputy Minister of Education, Sport and Culture
102. MANDISHONA, Gibson, Chairman, Zimbabwe Revenue Authority
103. MANDIZHA, Barbara, Deputy Police Commissioner
104. MANDIZHA, Albert, General Manager, Grain Marketing Board
105. MANGWANA, Munyaradzi Paul, Minister of State for Indigenization and Empowerment (former Minister of State for Anti-Corruption and Anti-Monopolies)
106. MANIKAI, Edwin, Chairperson, National Social Security Authority
107. MANYONDA, Kenneth Vhundukai, Former Deputy Minister of Industry and International Trade
108. MAPHOSA, Fidelian, Zanu-PF Politburo Committee member
109. MARUMAHOKO, Reuben, Deputy Minister of Foreign Affairs (former Deputy Minister of Home Affairs)
110. MASANGA, Gabriel, Former CEO, Zimbabwe Iron and Steel Company
111. MASANGO, Clemence, Chief Immigration Officer
112. MASAWI, Ephraim Sango, Former Provincial Governor, Mashonaland Central and Zanu-PF Politburo Deputy Secretary for Information and Publicity
113. MASHAIRE, Florence, Acting Chairperson, Zimbabwe Investment Authority
114. MASHAVA, G, Colonel
115. MASUKU, Angeline, Provincial Governor, Matabeleland South and Zanu-PF Politburo Secretary for Gender and Culture
116. MATANGA, Godwin, Deputy Police Commissioner

117. MATHEMA, Cain Ginyilitshe
Ndabazekhaya, Provincial Governor,
Bulawayo Metropolitan
118. MATHUTHU, Thokozile, Provincial
Governor, Matabeleland North and Zanu-
PF Politburo Secretary for Transport and
Welfare
119. MATIBIRI, Innocent, Deputy Police
Commissioner
120. MATIZA, Joel Biggie, Deputy
Minister for Rural Housing and Social
Amenities
121. MATONGA, Bright, Deputy Minister
for Information and Publicity
122. MATOWANYIKA, Dr Joseph, CEO,
Agriculture and Rural Development
Authority
123. MATSHALAGA, Obert, Deputy
Minister of Home Affairs (former Deputy
Minister of Foreign Affairs)
124. MATSHIYA, Melusi Mike, Permanent
Secretary, Ministry of Home Affairs
125. MAVHAIRE, Dzikamai, Zanu-PF
Politburo Member, Deputy Secretary of
the Politburo Committee on Lands and
Resettlement
126. MBIRIRI, Partson, Permanent
Secretary, Ministry of Local Government,
Public Works and Urban Development
127. MHANDU, Cairo (or Kairo), Major,
Zimbabwe National Army
128. MHONDA, Fidellis, Colonel
129. MIDZI, Amos Bernard Muvenga,
Minister for Mines and Mining
Development
130. MNANGAGWA, Emmerson
Dambudzo, Minister for Rural Housing
and Social Amenities and Zanu-PF
Politburo Secretary for Legal Affairs
131. MOHADI, Kembo Campbell Dugishi,
Minister of Home Affairs and Zanu-PF
Politburo Deputy Secretary for Legal
Affairs
132. MOMBESHORA, Millicent, Division
Chief, Head of Strategic Planning and
Special Projects, Reserve Bank of
Zimbabwe (RBZ)
133. MOYO, Headman, Zanu-PF
Provincial Chairman, Matabeleland North
134. MOYO, Jonathan Nathaniel, Former
Minister for Information and Publicity
135. MOYO, July Gabarari, Former
Minister of Energy and Power
Development and former Minister of
Public Service, Labour and Social
Welfare
136. MOYO, Musa, Zanu-PF Politburo
Committee member
137. MOYO, Onesimo, General Manager,
Mineral Marketing Corporation of
Zimbabwe
138. MOYO, Simon Khaya, Former Zanu-
PF Politburo Deputy Secretary for Legal
Affairs; Zimbabwe Ambassador to South
Africa
139. MOYO, Gilbert
140. MOYO, Sibusio Bussie, Brigadier
General, Zimbabwe National Army
141. MPABANGA, S, Lt Col
142. MPOFU, Obert Moses, Minister for
Industry and International Trade, Zanu-
PF Politburo Deputy Secretary for
National Security
143. MPOFU, Rido, Zanu-PF Provincial
Chairman, Matabeleland South
144. MSIKA, Joseph, Vice-President
145. MSIPA, Cephass George, Former
Provincial Governor, Midlands
146. MSIPA, Sharlottie
147. MUBAIWA, Richard, CEO,
Zimbabwe Investment Authority
148. MUCHENA, Olivia Nyembezi,
Minister of State for Science and
Technology Development and Zanu-PF
Politburo Secretary for Science and
Technology MUCHENA, Henry, Air Vice
Marshal
149. MUCHINGURI, Oppah Chamu
Zvipange, Minister for Women's Affairs,
Gender and Community Development,

- Zanu-PF Politburo Secretary for Women's Affairs
150. MUCHONO, C, Lt Col
 151. MUDEDE, Tobaiwa Tonnet, Registrar General
 152. MUDENGE, Stan Isaak Goreraivo, Minister of Higher and Tertiary Education and Zanu-PF Politburo Deputy Secretary for External Affairs
 153. MUDONHI, Columbus, Assistant Inspector, Zimbabwe Police
 154. MUDZVOVA, Paul, Sergeant
 155. MUGABE, Grace, Spouse of Robert Mugabe
 156. MUGABE, Leo, Member of Parliament and nephew of Robert Mugabe
 157. MUGABE, Robert Gabriel, President
 158. MUGABE, Sabina, Zanu-PF Politburo Senior Committee Member
 159. MUGARIRI, Bothwell, Senior Assistant Police commissioner, Officer Commanding Harare Province
 160. MUGUTI, Edwin, Deputy Minister of Health and Child Welfare
 161. MUJURU, Joyce, Vice-President
 162. MUJURU, Solomon Tapfumaneyi Ruzambo, Zanu-PF Politburo Senior Committee Member and former Commander, Zimbabwe Defence Forces
 163. MUMBA, Isaac, Superintendent Zimbabwe Police
 164. MUMBENGEGWI, Samuel Creighton, Minister of Finance (former Minister for Indigenization and Empowerment)
 165. MUMBENGEGWI, Simbarashe Simbanenduku, Minister for Foreign Affairs
 166. MUPFUMIRA, Prisca, Chairperson, Minerals Marketing Corporation of Zimbabwe
 167. MURERWA, Herbert Muchemwa, Former Minister of Finance and Zanu-PF Politburo Deputy Secretary for Education
 168. MURINGANI, Willie, Chairman, Zimbabwe National Water Authority
 169. MUSARIRI, Munyaradzi, Assistant Police Commissioner
 170. MUSHAYAKARARA, Elisha, CEO, Zimbabwe Financial Holding Company
 171. MUSHOHWE, Christopher Chindoti, Provincial Governor, Manicaland, Former Minister of Transport and Communication
 172. MUTASA, Didymus Noel Edwin, Minister of State for National Security, Lands, Land Reform and Resettlement, and Zanu-PF Politburo Secretary for Administration
 173. MUTASA, Mr Justin, Chairman, Zimbabwe Broadcasting Holdings; CEO, Zimbabwe Newspapers Group
 174. MUTASA, Gertrude, Colonel
 175. MUTEZO, Munacho Thomas Alvar, Minister for Water Resources and Infrastructural Development
 176. MUTINHIRI, Ambrose, Retired Brigadier, Minister of Youth Development, Gender and Employment Creation
 177. MUTINHIRI, Tracey, Deputy Minister of Indigenization and Empowerment
 178. MUTIWEKUZIVA, Kenneth Kaparadza, Deputy Minister for Small and Medium Enterprise Development
 179. MUTSVUNGUMA, S, Colonel
 180. MUVUTI, Samuel Tendai, Acting CEO, Grain Marketing Board
 181. MUZENDA, Tsitsi, Zanu-PF Politburo Senior Committee Member
 182. MUZONZINI, Elisha, Brigadier, Former Director-General Central Intelligence Organisation
 183. MZEMBI, Walter, Deputy Minister of Water Resources and Infrastructural Development
 184. MZILIKAZI, Morgan, Colonel
 185. NCUBE, Abedinico, Deputy Minister of Public Service, Labour and Social Welfare

186. NCUBE, Vivian, Commissioner,
Zimbabwe Electoral Commission
187. NDLOVU, Callistus, Chairman,
Net*One
188. NDLOVU, Lindela, Professor
189. NDLOVU, Naison, Zanu-PF Politburo
Secretary for Production and Labour
190. NDLOVU, Richard, Zanu-PF
Politburo Deputy Secretary for the
Commissariat
191. NDLOVU, Rose Jaele
192. NDLOVU, Sikhanyiso Duke, Former
Minister for Information and Publicity,
Zanu-PF Politburo Secretary for
Education (former Deputy Minister for
Higher and Tertiary Education)
193. NGUNI, Sylvester Robert, Minister of
Economic Development (former Deputy
Minister of Agriculture)
194. NHEMA, Francis Dunstan
Chenayimoyo, Minister of Environment
and Tourism
195. NHERERA, Prof Charles, Former
Chairman, Zimbabwe United Passenger
Company
196. NKALA, Herbert, Chairman,
Zimbabwe Newspapers Ltd
197. NKOMO, John Landa, Former
Speaker of Parliament and Chairman of
Zanu-PF
198. NKOMO, Georgina Ngwenya
199. NKOMO, Louise S (a.k.a. NHEMA,
Louise Sehulle)
200. NSIMBI, Zenzo, Former Zanu-PF
Politburo Member, Former Provincial
Governor, Bulawayo
201. NYAMBUYA, Michael Reuben,
Minister of Energy and Power
Development
202. NYANGULU, Nyepudzai, Chair,
Traffic Safety Council of Zimbabwe
(TSCZ)
203. NYANHONGO, Hubert Magadzire,
Deputy Minister of Transport and
Communications
204. NYATHI, George, Zanu-PF Politburo
Deputy Secretary of Science and
Technology
205. NYAWANI, Misheck
206. NYIKAYARAMBA, Brig Gen
Douglas, Chairman, National Railways of
Zimbabwe
207. NYONI, Sithembiso Gile Gladys,
Minister of Small and Medium Enterprise
Development and Zanu-PF Politburo
Deputy Secretary for Indigenization and
Empowerment
208. NYONI, Peter Baka
209. PARIRENYATWA, David Pagwese,
Minister of Health and Child Welfare and
Zanu-PF Politburo Deputy Secretary for
Health and Child Welfare
210. PARIRENYATWA, Choice
211. PATEL, Khantibhal, Zanu-PF
Politburo Deputy Secretary for Finance
212. PATEL, Bharat, Acting Attorney-
General
213. POTE, Selina M, Zanu-PF Politburo
Deputy Secretary for Gender and Culture
214. RANGWANI, Dani, Detective
Inspector
215. RAUTENBACH, Conrad Muller
(a.k.a. Billy)
216. RUGEJE, Engelbert Abel, Major
General
217. RUNGANI, Victor TC, Colonel
218. RUWODO, Richard, Brigadier
General (retired), former acting
Permanent Under Secretary at Ministry
of Defence
219. SAKABUYA, Morris, Deputy Minister
of Local Government, Public Works and
Urban Development
220. SAKUPWANYA, Stanley, Zanu-PF
Politburo Secretary for the Disabled and
Disadvantaged
221. SAMKANGE, Nelson Tapera Crispin,
Former Provincial Governor,
Mashonaland West
222. SANDI, Eunice, Zanu-PF Politburo
Deputy Secretary for Home Affairs

223. SAVANHU, Tendai, Zanu-PF
Politburo Deputy Secretary of Transport
and Social Welfare
224. SEKERAMAYI, Lovemore, Chief
Election Officer, Zimbabwe Electoral
Commission
225. SEKERAMAYI, Sydney Tigere,
Minister of Defence and Zanu-PF
Politburo Secretary for Health and Child
Welfare
226. SEKERAMAYI, Tsitsi Chirhuri
227. SHAMU, Webster Kotiwani, Minister
of State for Policy Implementation,
Member of Zanu-PF Politburo
228. SHAMUYARIRA, Nathan
Marwirakuwa, Zanu-PF Politburo
Secretary for Information and Publicity
229. SHIRI, Perence, Air Marshal (Air
Force)
230. SHUMBA, Isaiah Masvayamwando,
Deputy Minister of Education, Sports and
Culture
231. SIGAUKE, David, Brigadier
232. SIBANDA, Jabulani, Former National
Chairman, Zimbabwe National Liberation
War Veterans Association
233. SIBANDA, Levy, Deputy Police
Commissioner
234. SIBANDA, Mishek, Chief Secretary
to the President and Cabinet
235. SIBANDA, Phillip Valentine,
Commander, Zimbabwe National Army
236. SHUNGU, Etherton, Brigadier
237. SIBANDA, Chris, Colonel
238. SIKHOSANA, Absalom, Zanu-PF
Politburo Secretary for Youth Affairs
239. SIYACHITEMA, Jonathan,
Commissioner, Zimbabwe Electoral
Commission; Bishop
240. STAMPS, Timothy, Health Advisor in
the Office of the President
241. TAKAVARASHA, Tobias, Dr, CEO,
Agriculture and Rural Development
Authority
242. TAKAWIRA, Amod, CEO, National
Social Security Authority
243. TARUMBWA, Nathaniel Charles,
Brigadier
244. TSHAWWE, Jabulani, Zanu-PF
Provincial Chairman, Bulawayo
245. UNDENG, Samuel, Minister of
State for State Enterprises, Anti-
Monopolies and Anti-Corruption (former
Deputy Minister of Economic
Development)
246. UTETE, Charles, Chairman of the
Presidential Land Review Committee;
Chairman, Industrial Development
Corporation
247. VETERAI, Edmore, Senior Assistant
Police Commissioner, Officer
Commanding Harare
248. ZHUWAO, Patrick, Deputy Minister
of Science and Technology
249. ZHUWAO, Beauty Lily
250. ZIMONDI, Paradzai, Prisons Director
251. ZINDI, Fred, Chair, Postal and
Telecommunications Regulatory
Authority of Zimbabwe (POTRAZ)
252. ZVAYI, Caesar, Political and
Features Editor, Herald
253. ZVINAVASHE, Vitalis, Retired
General, Member of the Zanu-PF
Politburo, Secretary of the

ENTITIES

1. Politburo Committee on Indigenization
and Empowerment
2. Cold Comfort Farm Trust Co-Operative,
7 Cowie Road, Tynald, Harare
3. Jongwe Printing and Publishing
Company (a.k.a. Jongwe Printing and
Publishing Company (PVT) Ltd), 14
Austin Coventry Rd, Workington, Harare,
PO Box 5988, Zanu-PF's publishing arm
4. Zidco Holdings (a.k.a. Zidco Holdings
(PVT) Ltd), PO Box 1275, Harare
5. Zimbabwe Defence Industries (PVT) Ltd,
10th floor, Trustee House, 55 Samora
Machel Ave, Harare, PO Box 6597,
Harare

Additionally, Australia has placed an Arms embargo on Zimbabwe. For further information, please see: [Customs \(Prohibited Exports\) Regulations 1958, Regulation 13E](#). Australia has downgraded government-to-government contacts at multilateral forums as well as cultural links.

EUROPEAN UNION*

INDIVIDUALS

1. Mugabe, Robert Gabriel, President
2. Abu Basutu, Titus MJ, Air Vice-Marshal
4. Barwe, Reuben, Journalist with Zimbabwe Broadcasting Corporation
5. Bonyongwe, Happyton, Director-General Central Intelligence Organisation
6. Bonyongwe, Willa (a.k.a. Willia), Chair of Securities Commission, married to Happyton Bonyongwe.
7. Bredenkamp, John Arnold, Businessman
8. Buka (a.k.a. Bhuka), Flora, President's office (Former Minister of State for Special Affairs responsible for Land and Resettlement Programmes, former Minister of State in the Vice-President's office and former Minister of State for the Land Reform in the President's Office)
9. Bvudzijena, Wayne, Assistant Police Commissioner, Police Spokesman
10. Chairuka, Annie Flora Imagine, Married to Paradzai Zimondi
11. Chapfika, David, Former Deputy Minister of Agriculture (former Deputy Minister of Finance)
12. Charamba, George, Permanent Secretary, Department for Information and Publicity
13. Charamba, Rudo Grace, Married to George Charamba
14. Charumbira, Fortune Zefanaya, Former Deputy Minister for Local Government, Public Works and National Housing
15. Chidarikire, Faber Edmund, Provincial Governor for Mashonaland West, former Mayor of Chinhoyi
16. Chigudu, Tinaye, Former Provincial Governor: Manicaland.
17. Chigwedere, Aeneas Soko, Provincial Governor: Mashonaland East, former Minister
18. Chihota, Phineas, Deputy Minister for Industry and International Trade
19. Chihuri, Augustine, Police Commissioner
20. Chihuri, Isobel (a.k.a. Isabel) Halima, Married to Augustine Chihuri
21. Chimbudzi, Alice, ZANU (PF) Politburo Committee Member
22. Chimedza, Paul, President of the Medical Association of Zimbabwe, Doctor
23. Chimutengwende, Chenhamo Chekezha, Former Minister of State for Public and Interactive Affairs (former Minister of Information, former Minister of Post and Telecommunications)
24. Chinamasa, Monica, President of the Zimbabwe National Farmers' Union, married to Patrick Chinamasa
25. Chinamasa, Patrick Anthony, Minister of Justice, Legal and Parliamentary Affairs
26. Chindori-Chininga, Edward Takaruza, Former Minister of Mines and Mining Development
27. Chingoka, Peter Farai, Chairman of Zimbabwe Cricket
28. Chinotimba, Joseph, Vice Chairman of the Zimbabwe National Liberation War Veterans Association, leader of ZANU-PF militia
29. Chipanga, Tongesai Shadreck, Former Deputy Minister of Home Affairs
30. Chipwere, Augustine, Colonel, Bindura South

31. Chiremba, Mirirai, Director of Financial Intelligence at the Reserve Bank of Zimbabwe
32. Chitakunye, Eliphas, High Court Justice
33. Chitepo, Victoria, ZANU-PF Politburo Committee Member (former Minister of Information, former Minister of Post and Telecommunications and former Tourism Minister)
34. Chiwenga, Constantine, Commander Zimbabwe Defence Forces, General (former Army Commander, Lieutenant General)
35. Chiwenga, Jocelyn, Businesswoman, married to General Chiwenga, Commander of the Defence Forces
36. Chiweshe, George, Chairman, Zimbabwe Electoral Commission (Supreme Court Judge and Chairman of the controversial delimitation committee)
37. Chiwewe, Willard, Former Provincial Governor: Masvingo (former Senior Secretary responsible for Special Affairs in the President's Office)
38. Chombo, Ignatius Morgan Chiminya, Minister of Local Government, Public Works and Urban Development
39. Dabengwa, Dumiso, Former ZANU-PF Politburo Senior Committee Member, ZAPU leader
40. Damasane, Abigail, Deputy Minister for Women's Affairs, Gender and Community Development
41. Deketeke, Pikirayi, Chair of Broadcasting Authority of Zimbabwe and Editor of the official progovernment newspaper 'The Herald'
42. Dinha, Martin, Provincial Governor for Mashonaland Central.
43. Dokora, Lazarus, Deputy Minister for Higher and Tertiary Education
44. Dube, Tshinga, Judge, Head of Zimbabwe Defence Industries and ZANU-PF candidate in the parliamentary elections, Retired Colonel,
45. Gambe, Theophilus, Chairman, Electoral Supervisory Commission
46. Georgias, Aguy, Deputy Minister for Economic Development
47. Goche, Nicholas Tasunungurwa, Minister of Public Service, Labour and Social Welfare (former Minister of State for National Security in the President's Office)
48. Gono, Gideon, Governor of the Reserve Bank of Zimbabwe (central bank)
49. Gono, Helen (a.k.a. Hellin) Mushanyuri, Married to Gideon Gono
50. Gula-Ndebele, Sobuza, Former Attorney-General (Former Chairman of Electoral Supervisory Commission.)
51. Gumbo, Rugare Eleck Ngidi, Former Minister of Agriculture (Former Minister of Economic Development)
52. Gurira, Cephas T., Colonel, Mhondoro Mubaira.
53. Gwekwerere, Stephen Colonel, Chinhoyi.
54. Hove, Richard, ZANU-PF Politburo Secretary for Economic Affairs
55. Hungwe, Josaya (a.k.a. Josiah) Dunira, Former Provincial Governor: Masvingo
56. Huni, Munyaradzi, Journalist on the official pro-government newspaper 'The Herald'
57. Jangara aka Changara, Thomsen, Assistant Police Commissioner, Officer in charge, Harare South District
58. Kachepa, Newton, Member of Parliament for Mudzi North
59. Kangai, Kumbirai, ZANU-PF Politburo Committee Member
60. Karakadzai, Mike Tichafa, Air Commodore, Harare Metropolitan Province
61. Karimanzira, David Ishemunyoro Godi, Provincial Governor: Harare and ZANU-PF Politburo Secretary for Finance
62. Kasukuwere, Saviour, Deputy Minister for Youth Development & Employment Creation and ZANU-PF Politburo Deputy-Secretary for Youth Affairs
63. Kaukonde, Ray Joseph, Former Provincial Governor: Mashonaland East

64. Kazangarare, Jawet, ZANU-PF Councillor in Hurungwe North and war veteran
65. Kazembe, Joyce Laetitia, Deputy Chairperson of the Zimbabwe Electoral Commission and Chair of ZEC's Media Monitoring Commission
66. Kereke, Munyaradzi, Chief Adviser to the Governor of the Reserve Bank of Zimbabwe
67. Khumalo, Sibangumuzi, Brigadier General, Matebeleland North
68. Kunonga, Nolbert (a.k.a. Nobert), Self-appointed Anglican Bishop
69. Kuruneri, Christopher Tichaona, Former Minister of Finance and Economic Development
70. Kwainona, Martin, Assistant Commissioner
71. Kwenda, R, Major, Zaka East
72. Langa, Andrew, Deputy Minister of Environment and Tourism (former Deputy Minister of Transport and Communications)
73. Lesabe, Thenjiwe V., ZANU-PF Politburo Committee Member
74. Mabunda, Musarashana, Assistant Police Commissioner
75. Machaya, Jason (a.k.a. Jaison) Max Kokerai, Provincial Governor: Midlands. Former Deputy Minister of Mines and Mining Development
76. Made, Joseph Mtakwese, State Minister of Agricultural Engineering and Mechanisation (Former Minister of Agriculture and Rural Development)
77. Made, Patricia A., Former director of Inter-Press Service, married to Joseph Made.
78. Madzongwe, Edna (a.k.a. Edina), ZANU-PF President of Senate
79. Mahofa, Shuvai Ben, Former Deputy Minister for Youth Development, Gender and Employment Creation
80. Mahoso, Tafataona, Chair, Media Information Commission
81. Makwanya, Judith, Journalist with Zimbabwe Broadcasting Corporation
82. Makwavarara, Sekesai, Former Mayor of Harare
83. Malinga, Joshua, ZANU-PF Politburo Deputy Secretary for Disabled and Disadvantaged
84. Maluleke, Titus, Provincial Governor: Masvingo (Former Deputy Minister of Education, Sports and Culture)
85. Mangwana, Paul Munyaradzi, Minister of State for Indigenisation and Empowerment
86. Manyonda, Kenneth Vhundukai, Former Deputy Minister of Industry and International Trade
87. Marumahoko, Reuben, Deputy Minister for Foreign Affairs (former Deputy Minister for Home Affairs)
88. Masawi, Ephraim Sango, Former Provincial Governor: Mashonaland Central
89. Mashava, G. Colonel, Chiredzi Central
90. Masuku, Angeline, Provincial Governor: Matabeleland South and ZANU-PF Politburo, Secretary for Disabled and Disadvantaged
91. Matanyaire, Munyaradzi, Chief Executive Officer of Zimbabwe Inter-Africa News Agency
92. Mathema, Cain Ginyiltshe Ndabazekhaya, Provincial Governor: Bulawayo
93. Mathuthu, Thokozile, Provincial Governor: Matabeleland North and ZANU-PF Politburo, Deputy Secretary for Transport and Social Welfare
94. Matiza, Joel Biggie, Deputy Minister for Rural Housing and Social Amenities
95. Matonga, Brighton, Deputy Minister for Information and Publicity
96. Matshalaga, Obert, Deputy Minister of Home Affairs (Former Deputy Minister of Foreign Affairs)
97. Matshiya, Melusi (Mike), Permanent Secretary, Ministry of Home Affairs
98. Mavhaire, Dzikamai, ZANU-PF Politburo Committee Member
99. Mbiriri, Partson, Permanent Secretary, Ministry of Local Government, Public Works and Urban Development

100. Mhandu, Cairo (a.k.a. Kairo), Major ZNA
101. Mhonda, Fidellis, Colonel, Rushinga
102. Midzi, Amos Bernard (Mugenva), Former Minister of Mines and Mining Development (former Minister of Energy and Power Development)
103. Mnangagwa, Emmerson Dambudzo, Minister of Rural Housing and Social Amenities (former Speaker of Parliament)
104. Mohadi, Kembo Campbell Dugishi, Minister of Home Affairs (former Deputy Minister of Local Government, Public Works and National Housing)
105. Mombeshora, Millicent Sibongile, Head of Strategic Planning and Special Projects, Reserve Bank of Zimbabwe
106. Moyo, Gilbert, 'War veteran', leader of ZANU-PF militia
107. Moyo, Jonathan, Former Minister of State for Information and Publicity in the President's Office
108. Moyo, July Gabarari, Former Minister of Energy and Power Development (former Minister of Public Service, Labour and Social Welfare)
109. Moyo, Sibusio Bussie, Brigadier General ZNA
110. Moyo, Simon Khaya, Ambassador to South Africa and ZANU-PF Politburo Deputy Secretary for Legal Affairs
111. Mpabanga, S., Lieutenant-Colonel, Mwenezi East
112. Mpofo, Obert Moses, Minister for Industry and International Trade (former Provincial Governor: Matabeleland North) (ZANU-PF Politburo Deputy Secretary for National Security)
113. Msika, Joseph W., Vice-President
114. Msipa, Cephas George, Former Provincial Governor: Midlands
115. Muchechetere, Happison, Acting Chief Executive of Zimbabwe Broadcasting Corporation
116. Muchena, Henry, Air Vice-Marshal, Midlands
117. Muchena, Olivia Nyembesi (a.k.a. Nyembezi), Minister of State for Science and Technology in the President's Office (former Minister of State in Vice-President Msika's Office)
118. Muchinguri, Oppah Chamu Zvipange, ZANU-PF Politburo Secretary for Gender and Culture (Former Minister for Women's Affairs, Gender and Community Development)
119. Muchono, C., Lieutenant-Colonel, Mwenezi West
120. Mudede, Tobaiwa (a.k.a. Tonneth), Registrar General
121. Mudenge, Isack Stanislaus Goreraivo, Minister of Higher Tertiary Education (former Minister of Foreign Affairs)
122. Mudonhi, Columbus, Assistant Inspector ZRP
123. Mudzvova, Paul, Sergeant
124. Mugabe, Grace, Spouse of the Head of Government
125. Mugabe, Leo, Director of Zimbabwe Defence Industries, nephew of Robert Mugabe
126. Mugabe, Sabina, ZANU-PF Politburo Senior Committee Member
127. Mugariri, Bothwell, Former Senior Assistant Police Commissioner
128. Muguti, Edwin, Deputy Minister for Health and Child Welfare
129. Mujuru, Joyce Teurai Ropa, Vice President (former Minister of Water Resources and Infrastructural Development)
130. Mujuru, Solomon T.R., ZANU-PF Politburo Senior Committee Member
131. Mukosi, Musoro Wegomo, Producer with Zimbabwe Broadcasting Corporation
132. Mumba, Isaac, Superintendent
133. Mumbengegwi, Samuel Creighton, Former Minister of Finance; former Minister of State for Indigenisation and Empowerment
134. Mumbengegwi, Simbarashe Simbanenduku, Minister of Foreign Affairs
135. Murerwa, Herbert Muchemwa, Former Minister of Finance

136. Musariri, Munyaradzi, Assistant Police Commissioner
137. Mushohwe, Christopher Chindoti, Provincial Governor: Manicaland. (Former Minister of Transport and Communications, former Deputy Minister of Transport and Communications)
138. Mutasa, Didymus Noel Edwin, Minister of State for National Security, Land Reform and Resettlement in the Office of the President, ZANU-PF, Secretary for Administration
139. Mutasa, Gertrude, Colonel in the Zimbabwe Defence Force, married to Didymus Mutasa (item 138)
140. Mutasa, Justin Mutsawehuni, Chair of Zimbabwe Broadcasting Holdings and Chief Executive of Zimbabwe Newspapers
141. Mutezo, Munacho, Former Minister for Water Resources and Infrastructural Development
142. Mutinhiri, Ambros (a.k.a. Ambrose), Minister of Youth Development, Gender and Employment Creation, Retired Brigadier
143. Mutinhiri, Tracey, Deputy Minister for Indigenisation and Empowerment (Former Deputy Speaker of the Senate)
144. Mutiwekuziva, Kenneth Kaparadza, Former Deputy Minister of Small and Medium Enterprises, Development and Employment Creation
145. Mutsvunguma, S., Colonel, Headlands
146. Muzenda, Tsitsi V., ZANU-PF Politburo Senior Committee Member
147. Muzonzini, Elisha, Brigadier (former Director-General Central Intelligence Organisation)
148. Mzembi, Walter, Deputy Minister for Water Resources and Infrastructural Development
149. Mzilikazi, Morgan S., Colonel (MID), Buhera Central
150. Ncube, Abedinico, Deputy Minister of Public Service, Labour and Social Welfare (former Deputy Minister of Foreign Affairs)
151. Ndlovu, Naison K., Deputy President of the Senate, and ZANU-PF Politburo Secretary for Production and Labour
152. Ndlovu, Richard, ZANU-PF Politburo Deputy Commissariat
153. Ndlovu, Sikhanyiso, Former Minister of Information and Publicity (Former Deputy Minister of Higher and Tertiary Education)
154. Nguni, Sylvester, Minister of Economic Development (Former Deputy Minister for Agriculture)
155. Nhema, Francis, Minister of Environment and Tourism
156. Nkala, Herbert, Chair of Zimbabwe Newspapers, which prints State propaganda and Chair of First Banking Corporation.
157. Nkomo, John Landa, Former Speaker of House of Assembly (former Minister of Special Affairs in the President's Office), ZANU-PF national chairman
158. Nyambuya, Michael Reuben, Former Minister for Energy and Power Development (former Lieutenant General, Provincial Governor: Manicaland)
159. Nyanhongo, Magadzire Hubert, Deputy Minister of Transport and Communications
160. Nyathi, George, ZANU-PF Politburo Deputy Secretary of Science and Technology
161. Nyawani, Misheck, Retired Superintendant
162. Nyikayaramba, Douglas, Brigadier General, Mashonaland East
163. Nyoni, Sithembiso Gile Glad, Minister of Small and Medium Enterprises Development and Employment Creation
164. Parirenyatwa, Choice, Married to David Parirenyatwa
165. Parirenyatwa, David Pagwese, Minister of Health and Child Welfare (former Deputy Minister)
166. Patel, Bharat, Former Acting Attorney General, Justice, Hon.
167. Patel, Khantibhal, ZANU-PF Politburo Deputy Secretary for Finance
168. Pote, Selina M., ZANU-PF Politburo Deputy Secretary for Gender and Culture

169. Rangwani, Dani, Police Detective Inspector
170. Rautenbach, Muller Conrad (a.k.a. Billy), Businessman
171. Rugeje, Engelbert Abel, Major-General, Masvingo Province
172. Rungani, Victor TC, Colonel, Chikomba
173. Ruwodo, Richard, Brigadier General, promoted on 12 August 2008 to the rank of Major General (retired); former Acting PUS for Ministry of Defence
174. Sakabuya, Morris, Deputy Minister for Local Government, Public Works and Urban Development
175. Sakupwanya, Stanley, ZANU-PF Politburo Deputy Secretary for Health and Child Welfare
176. Samkange, Nelson Tapera Crispen, Former Provincial Governor: Mashonaland West
177. Sandi, E., ZANU-PF Politburo Deputy Secretary for Women's Affairs
178. Savanhu, Tendai, ZANU-PF Deputy Secretary for Transport and Social Welfare
179. Sekeramayi, Sydney (a.k.a. Sidney) Tigere, Minister of Defence
180. Sekeremayi (a.k.a. Sekeramayi), Tsitsi Chihurim Married to Sydney Sekeremayi
181. Sekeremayi, Lovemore, Chief Elections Officer
182. Shamu, Webster Kotiwani, Minister of State for Policy Implementation (former Minister of State for Policy Implementation in the President's Office)
183. Shamuyarira, Nathan Marwirakuwa, ZANU-PF Politburo Secretary for Information and Publicity
184. Shiri, Perence a.k.a. Bigboy Samson Chikerema, Air Marshal (Air Force)
185. Shumba, Isaiah Masvayamwando, Deputy Minister of Education, Sports and Culture
186. Shungu, Etherton, Brigadier General, Mashonaland Central
187. Sibanda, Chris Colonel, Bulawayo Province
188. Sibanda, Jabulani, Former Chair, National War Veterans Association
189. Sibanda, Misheck Julius Mpande, Cabinet Secretary (successor to Charles Utete)
190. Sibanda, Phillip Valerio (a.k.a. Valentine), Commander Zimbabwe National Army, Lieutenant General
191. Sigauke, David, Brigadier General, Mash West Province
192. Sikosana, Absalom, ZANU-PF Politburo Secretary for Youth Affairs
193. Stamps, Timothy, Health Advisor in the Office of the President, Former Health Minister
194. Tarumbwa, Nathaniel Charles, Brigadier General, Manicaland and Mutare South
195. Tomana, Johannes, Attorney General
196. Tonderai Matibiri, Innocent, Deputy Police Commissioner
197. Udenge, Samuel, Minister of State for State Enterprises (Former Deputy Minister of Economic Development)
198. Utete, Charles, Chairman of the Presidential Land Review Committee (former Cabinet Secretary)
199. Veterai, Edmore, Senior Assistant Police Commissioner, Officer Commanding Harare
200. Zhuwao, Patrick, Deputy Minister for Science and Technology (NB Mugabe's nephew)
201. Zimondi, Paradzai, Prisons Director
202. Zvayi, Caesar, Journalist on the official pro-government newspaper 'The Herald'
203. Zvinavashe, Vitalis, Politburo, Indigenisation and Empowerment Committee in the party

ENTITIES

1. Alpha International (PVT) Ltd, Owned by John Arnold Bredenkamp.
2. Breco (Asia Pacific) Ltd, Owned by John Arnold Bredenkamp.

3. Breco (Eastern Europe) Ltd, Owned by John Arnold Bredenkamp.
4. Breco (South Africa) Ltd, Owned by John Arnold Bredenkamp.
5. Breco (UK) Ltd, Owned by John Arnold Bredenkamp.
6. Breco Group, Owned by John Arnold Bredenkamp.
7. Breco International, Owned by John Arnold Bredenkamp.
8. Breco Nominees Ltd, Owned by John Arnold Bredenkamp.
9. Breco Services Ltd, Owned by John Arnold Bredenkamp.
10. Cold Comfort Farm Trust Co-operative, Owned by Didymus Mutasa, Grace Mugabe also involved.
11. Comoil (PVT) Ltd, Owned by Saviour Kasukuwere.
12. Corybantes Ltd, Owned by John Arnold Bredenkamp.
13. Divine Homes (PVT), Chaired by David Chapfika.
14. Echo Delta Holdings, Owned by John Arnold Bredenkamp.
15. Famba Safaris, Major shareholder is Webster Shamu.
16. Industrial Development Corporation of Zimbabwe, Wholly owned by the Government of Zimbabwe.
17. Intermarket Holdings Ltd, Subsidiary of ZB Financial Holdings Ltd.
18. Jongwe Printing and Publishing Company (PVT) Ltd (a.k.a. Jongwe Printing and Publishing Co., a.k.a. Jongwe Printing and Publishing Company), ZANU-PF's publishing arm.
19. M & S Syndicate (PVT) Ltd, ZANU-PF's investment company.
20. Masters International Ltd, Owned by John Arnold Bredenkamp.
21. Ndlovu Motorways, Controlled by Sikhanyiso Ndlovu.
22. Oryx Diamonds Ltd (a.k.a. Oryx Natural Resources), Company enabling ZANU-PF

- officials to derive personal benefit from mining ventures in the Democratic Republic of Congo.
23. OSLEG Ltd (a.k.a. Operation Sovereign Legitimacy), Controlled by Zimbabwe army.
 24. Piedmont (UK) Ltd, Owned by John Arnold Bredenkamp.
 25. Raceview Enterprises, Owned by John Arnold Bredenkamp.
 26. Ridgepoint Overseas Developments Ltd (a.k.a. Ridgepoint Overseas Developments Ltd), Owned by Billy Rautenbach.
 27. Scotfin Ltd, Wholly owned by ZB Financial Holdings Ltd.
 28. Scottlee Holdings (PVT) Ltd, Owned by John Arnold Bredenkamp.
 29. Scottlee Resorts Ltd, Owned by John Arnold Bredenkamp.
 30. Swift Investments (PVT) Ltd, Controlled by Zanu-PF, directors include Vitalis Zvinvashe.
 31. Timpani Export Ltd, Owned by John Arnold Bredenkamp.
 32. Tremalt Ltd Thetford Farm, Owned by John Arnold Bredenkamp.
 33. ZB Financial Holdings Ltd (a.k.a. Finhold), Over 75 % owned by the Government of Zimbabwe.
 34. ZB Holdings Ltd, Wholly owned by ZB Financial Holdings Ltd.
 35. Zidco Holdings (a.k.a. Zidco Holdings (PVT) Ltd), ZANU-PF's financial holding company.
 36. Zimbabwe Defence Industries, Wholly owned by the Government of Zimbabwe. Directors include Leo Mugabe and Solomon Mujuru.
 37. Zimbabwe Iron and Steel Company (a.k.a. Zisco, Ziscosteel), Over 88 % owned by the Government of Zimbabwe.
 38. Zimbabwe Mining Development Corporation, Wholly owned by the Government of Zimbabwe.
 39. Zimre Holdings Ltd, Over 69 % owned by the Government of Zimbabwe.

40. Zimre Reinsurance Company (PVT) Ltd,

Wholly owned by Zimre Holdings Ltd

*** While not a member of the EU, this list includes the Kingdom of Norway**

NEW ZEALAND

INDIVIDUALS

1. Abu Basutu, Titus M. J., Air Vice Marshal, Matebeleland South
2. Ahmed Al-Shanfari (aka AL SHANFARI), Thamer Bin Said, Former Chairman of Oryx Group and Oryz Natural Resources
3. Barwe, Reuben, Journalist, Zimbabwe Broadcasting Corporation
4. Ben-Menashe, Ari
5. Bimha, Mike (Michael) aka Chakanaka, Chairman, Air Zimbabwe
6. Bonyongwe, Happyton, Director-General, Central Intelligence Organisation
7. Bonyongwe, Willa or Willia, Chair, Securities Commission, spouse of Happyton Bonyongwe
8. Bredenkamp, John Arnold, Businessman
9. Buka (aka Bhuka), Flora, President's office, former Minister for Special Affairs, responsible for Lands and Resettlement Programmes, former Minister of State in the Vice-President's office and former Minister of State for the Land Reform in the President's Office
10. Bvute, Ozias, CEO/Managing Director of Zimbabwe Cricket
11. Bvuzijena (or Bvudzijena), Wayne, Assistant Police Commissioner, Police Spokesman
12. Chairuka, Annie Flora Imagine, Spouse of Paradzai Zimondi
13. Chanetsa, Beatrice, Spouse of Peter Chanetsa
14. Chanetsa, Peter Mashonaland Central
15. Chapfika, Abina, Spouse of David Chapfika
16. Chapfika, David, Former Deputy Minister of Agriculture (former Deputy Minister of Finance and Economic Development)
17. Charamba, George, Information Minister's Permanent Secretary and Spokesman or Permanent Secretary, Department for Information and Publicity
18. Charamba, Rudo Grace, Spouse of George Charamba
19. Charavaya, Justin, ZEC Senior Constituency Officer
20. Charumbira, Fortune, aka Zefanaya, President of the Council of Chiefs and former Deputy Minister of Local Government, Public Works and National Housing, Member of the Zanu-PF Central Committee Member
21. Chawe, McLoud, ZANU-PF Provincial Chair, Bulawayo
22. Chawota (aka Chaota), David, Acting CEO, Civil Aviation Authority of Zimbabwe
23. Chidarikire, Faber Edmund, Provincial Governor for Mashonaland West, former Mayor of Chinhoyi
24. Chidhakwa, Walter, Chairman, Tel-One
25. Chidyausiku, Godfrey, Chief Justice - Supreme Court

26. Chigudu, Tinaye (aka Tinayi) Elisha Nzirasha, Former Provincial Governor - Manicaland
27. Chigwedere, Aeneas Soko, Provincial Governor, Mashonaland East, Former Education, Sports and Culture Minister
28. Chigwedere, Emilia, Spouse of Aeneas Chigwedere
29. Chihota (aka Chiota), Phineas, Deputy Minister for Industry and International Trade
30. Chihuri, Augustine, Police Commissioner-General
31. Chihuri, Isabel (or Isobel) Halima, Spouse of Augustine Chihuri
32. Chikaura, Charles, CEO Zimbabwe Development Bank, Chairman, Grain Marketing Board
33. Chikumba, Luke Kudakwashe, ZEC Senior Constituency Officer
34. Chimbudzi, Alice, ZANU-PF Politburo Committee Member
35. Chimedza, Dr. Paul, President of the World Medical Association, Zimbabwe Branch (or President of the Medical Association of Zimbabwe)
36. Chimutengwende, Chenhamo Chakezha (or Chekezha) Chen, Former Minister for State of Public and Interactive Affairs (former Minister of Post and Telecommunications, former Minister of Information)
37. Chinamasa, Monica, President of the Zimbabwe National Farmers Union, Spouse of Patrick Chinamasa
38. Chinamasa, Patrick Anthony, Minister of Justice, Legal and Parliamentary Affairs
39. Chinawande, Smart, ZEC Senior Constituency Officer
40. Chindori-Chininga, Edward Takaruza, Former Mines and Energy Minister, Former Minister of Mines and Mining Development
41. Chingoka, Peter Farai, Chairman of Zimbabwe Cricket
42. Chinotimba, Joseph, Vice Chairman of Zimbabwe National Liberation War Veterans' Association, leader of ZANU-PF militia
43. Chipanga, Tongesai Shadreck, Former Deputy Minister of Home Affairs 10.10.1946 or 10.10.1940
44. Chipwere, Augustine Colonel, Bindura South
45. Chiremba, Mirirai, Director of Financial Intelligence, Unit Chief, Reserve Bank Zimbabwe
46. Chitakunye, Eliphas, High Court Justice
47. Chitepo, Victoria, ZANU-PF Politburo Committee member, former Minister of Information, former Minister of Post and Telecommunications and former Tourism Minister 27.3.1928
48. Chivamba, Kizito, ZANU-PF Provincial Chair, Midlands
49. Chiwenga, Constantine, Commander Zimbabwe Defence Forces, General (former Army Commander, Lieutenant General)
50. Chiwenga, Jocelyn Mauchaza Businesswoman, Spouse of Constantine Chiwenga
51. Chiweshe, George, Chairman - Zimbabwe Electoral Commission, Supreme Court Judge
52. Chiwewe, Willard, Former Provincial Governor – Masvingo, former Senior Secretary responsible for Special Affairs in the President's Office 19.3.1949
53. Chiwereweshe, Thompson ZEC Senior Constituency Officer
54. Chiyangwa, Jocelyn, Spouse of Philip Chiyangwa

55. Chiyangwa, Philip, Former ZANU-PF Provincial Chairman - Mashonaland West
56. Chombo, Ever, Spouse of Ignatius Chombo
57. Chombo, Ignatius Morgan Chiminya, Minister of Local Government, Public Works and Urban Development
58. Chombo, Marian, Spouse of Ignatius Chombo
59. Chunga, Fred, Director of Land Acquisition
60. Churu, Zvinechimwe, CEO, National Oil Company of Zimbabwe
61. Dabengwa, Dumiso, Former ZANU-PF Politburo Senior Committee Member, ZAPU leader
62. Damasane, Abigail, Deputy Minister of Women's Affairs, Gender and Community Development
63. Davy, Charles Businessman
64. Deketeke, Pirirayi (or Pikirayi), Chairman Broadcasting Authority of Zimbabwe and Editor of 'The Herald' newspaper
65. Dinha, Martin, aka Advocate Martin, Provincial Governor for Mashonaland Central Dokora, Lazarus Deputy Minister for Higher and Tertiary Education
66. du Bois, Willy Frank
67. Dube, Canaan Farirai
68. Dube, Tshinga Judge, CEO - Zimbabwe Defence Industries; retired colonel and ZANU-PF candidate in the parliamentary elections
69. Emray, Neville, Businessman
70. Fundira, Emmanuel, Chairperson - Zimbabwe Tourism Authority
71. Gata, Sydney, Former Chairman, Zimbabwe Electricity Supply Authority Georgias, Aruy (or Aguy) Deputy Minister of Economic Development
72. Goche, Nicholas Tasunungurwa, Minister of Public Services, Labour and Social Welfare, (former Minister of State for National Security in the President's Office)
73. Gombe (or Gambe), Theophilus Pharaoh (aka G Gombe), Chairman, Zimbabwe Electoral Supervisory Commission
74. Gono, Gideon, Governor, Reserve Bank of Zimbabwe
75. Gono (aka GOYO), Hellin (aka Helen) Mushanyuri, Spouse of Gideon Gono
76. Gowu, Alois, Acting CEO, Zimbabwe Iron and Steel Company
77. Gula-Ndebele, Sobuza, Former Attorney General, former Chairman of Electoral Supervisory Commission
78. Gumbo, Rugare Eleck Ngidi Former Minister of Agriculture (former Minister of Economic Development)
79. Gundu, Lloyd, CIO official
80. Gurira, Cephas T. Colonel, Mhondoro Mubaira
81. Gwekwerere, Stephen Colonel Chinhoyi
82. Hove, Richard, ZANU-PF Politburo Secretary for Economic Affairs
83. Hungwe, Josaya Dunira (alias Josiah) Former Provincial Governor, Masvingo
84. Huni, Munyaradzi, Journalist, Zimbabwe Herald
85. Jaele, Orse, Spouse of Sikhanyiso Ndlovu
86. Jangara (or CHANGARA), Thomsen Toddie, Assistant Police Commissioner, ZRP Chief Superintendent for Harare South
87. Jokonya, Tichaona Joseph Benjamin, Minister of Information and Publicity
88. Jonato, Noel ZEC Senior Constituency Officer
89. Joshni, Heena Jayant, Businessman

90. Joshni, Jayant Chunilal, Businessman
91. Joshni, Manharial Chunilal, Businessman
92. Kachepa, Newton, MP for Mudzi North
93. Kachingwe, Sarah, Commissioner, Zimbabwe Electoral Commission
94. Kadziya, Jim, ZEC Senior Constituency Officer
95. Kadzura, Jonathon, Vice Chairman, Air Zimbabwe
96. Kahari, George Payne, Commissioner, Zimbabwe Electoral Commission
97. Kanenzoni, Elliot, CIO official
98. Kangai, Kumbirai, ZANU-PF Politburo Committee Member, Secretary for External Affairs
99. Karakadzai, Mike Tichafa, Air Commodore, Harare Metropolitan Province
100. Karimanzira, David Ishemunyoro Godi, Provincial Governor, Harare and ZANU-PF Politburo Secretary for Finance
101. Kaseke, Karikoga, Chairman Zimbabwe Tourism Authority
102. Kasukuwere, Barbara, Spouse of Saviour Kasukuwere
103. Kasukuwere, Saviour, Deputy Minister for Youth Development & Employment Creation, and ZANU-PF Politburo Deputy-Secretary for Youth Affairs
104. Kaukonde, Ray Joseph, Former Provincial Governor - Mashonaland East
105. Kazangarare, Jawet, ZANU-PF Councillor in Hurungwe North and war veteran
106. Kazembe, Joyce Laetitia, Deputy Chair Zimbabwe Electoral Commission and Chair of ZEC's Media Monitoring Commission
107. Kereke, Munyaradzi, Principal Advisor to Reserve Bank of Zimbabwe Governor
108. Khumalo, Sibangumuzi M. (aka Sixton) Brigadier General, Matebeleland North
109. Kunonga, Nolbert (or Nobert), Self-appointed Anglican Bishop
110. Kurasha, Prof Jameson Chairman Zimbabwe Post Ltd
111. Kuruneri, Christopher Tichaona, Former Minister of Finance and Economic Development
112. Kutywayo, Dumisani, ZEC Senior Constituency Officer
113. Kwainona, Martin Assistant Commissioner, Zimbabwe Police
114. Kwenda, R. Major, Zaka, East
115. Langa, Andrew Deputy Minister of Environment and Tourism (former Deputy Minister of Transport and Communication)
116. Lesabe, Thenjiwe V., Zanu-PF Politburo Member
117. Mabaira, Stanley, ZEC Senior Constituency Officer
118. Mabunda, Musarahana (or Musarashana), Assistant Police Commissioner, Commanding Officer, Law and Order Division
119. Machaya, Jaison (aka Jason) Max Kokerai, Provincial Governor, Midlands, former Deputy Minister for Mines & Mining Development
120. Made, Joseph Mtakwese, Minister of State for Agricultural Engineering and Mechanisation (former Minister for Agriculture and Rural Development)
121. Made, Patricia, Former director of Inter-Press Service, Spouse of Joseph Made
122. Madzongwe, Edna (aka Edina), ZANU-PF President of the Senate

123. Mafa, David, John ZANU-PF
Provincial Chairman - Mashonaland
West
124. Mahofa, Shuvai Ben, Former
Deputy Minister for Youth
Development, Gender and
Employment Creation
125. Mahoso, Tafataona, Chair,
Media Information Commission
126. Makoni, Alpinos
127. Makoni, John Samson, ZEC
Senior Constituency Officer
128. Makonyere, Wellington,
Managing Director, Tel-One
129. Makwanya, Judith, Journalist,
Zimbabwe Broadcasting Corporation
130. Makwavara (or Makwavarara),
Sekesai, Former Mayor of Harare
(ZANU-PF) Malinga, Joshua ZANU-
PF Politburo Deputy-Secretary for
Disabled and Disadvantaged
131. Malinga, Sithembiso (or
Sithemboso), ZANU-PF Politburo
Deputy Secretary for Indigenization
132. Maluleke, Titus Hatlani,
Provincial Governor, Masvingo,
former Deputy Minister of Education,
Sports and Culture
133. Mandishona, Gibson, Chairman,
Zimbabwe Revenue Authority
134. Mandizha, Albert, General
Manager, Grain Marketing Board
135. Mandizha, Barbara, Deputy
Police Commissioner
136. Mangwana, Paul Munyaradzi,
Minister of State for Indigenization
and Empowerment (former Minister
of State Enterprises, Anti-Corruption
and Anti-Monopolies)
137. Manikai, Edwin Isaac,
Businessman or Chairperson,
National Social Security Authority
138. Manyonda, Kenneth (aka
Vhundukai), Former Deputy Minister
of Industry and International Trade
139. Manzanga, Niko Eken, ZEC
Senior Constituency Officer
140. Maphenduka, Jonathon
141. Maphosa, Fidelian, ZANU-PF
Politburo Committee member
142. Mapuranga, Josphat, ZEC
Senior Constituency Officer
143. Maronge, Abiot, ZEC Senior
Constituency Officer
144. Marufu, Reward, Businessman
145. Marumahoko, Reuben, Deputy
Minister of Foreign Affairs (former
Deputy Minister of Home Affairs)
4.4.1948
146. Masanga, Gabriel Former CEO -
Zimbabwe Steel and Iron Company
147. Masango, Clemence Chief
Immigration Officer
148. Masawi, Ephraim Sango
Former Provisional Governor,
Mashonaland Central, ZANU-PF
Politburo Deputy Secretary for
Information and Publicity
149. Mashaire, Florence Acting
Chairperson - Zimbabwe Investment
Centre 28.2.1967 Mashamba,
Kenneth ZEC Senior Constituency
Officer
150. Mashava, G Colonel, Chiredzi
Central
151. Masuku, Angeline, Provisional
Governor, Matabeleland South and
ZANU-PF Politburo, Secretary for
Disabled and Disadvantaged
152. Matanga, Godwin, Deputy Police
Commissioner
153. Matanyaire, Munyaradzi, Chief
Executive Officer of Zimbabwe Inter-
Africa News Agency
154. Mathema, Cain Ginyilitshe
Ndabazekhaya, Provisional
Governor, Bulawayo
155. Mathuthu, Thokozile, Provisional
Governor, Matabeleland North and
ZANU-PF Politburo, Deputy

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|---|--|
| <p>Secretary for Transport and Social Welfare</p> <p>156. Matiza, Joel Biggie (or Biggie Joel), Deputy Minister of Rural Housing and Social Amenities</p> <p>157. Matonga, Bright (aka Brighton), Deputy Minister for Information and Publicity</p> <p>158. Matowanyika, Dr. Joseph, CEO Agriculture and Rural Development Authority Matshalaga, Obert Deputy Minister of Home Affairs (former Deputy Minister of Foreign Affairs)</p> <p>159. Matshiya, Melusi Mike, Permanent Secretary, Ministry of Home Affairs</p> <p>160. Mavhaire, Dzikamai, Zanu-PF Politburo Member, Deputy Secretary of the Politburo Committee on Lands and Resettlement</p> <p>161. Mawere, Mutumwa, Businessman</p> <p>162. Maxwebo, Campion, Deputy to Fred Chunga</p> <p>163. Mbiriri, Partson, Permanent Secretary, Ministry of Local Government, Public Works and Urban Development</p> <p>164. Mhandu, Kairo (or Cairo), Major, Zimbabwe National Army</p> <p>165. Mhlanga, Endy, Secretary General of War Veterans</p> <p>166. Mhonda, Fidellis Colonel, Rushinga</p> <p>167. Midzi, Amos Bernard Muvenga (or Mugenva), Former Minister of Mines and Mining Development (former Minister for Energy and Power Development)</p> <p>168. Mkushi, John Piniel, Businessman</p> <p>169. Mkushi, Thokozani</p> <p>170. Mlambo, Sephath</p> <p>171. Mnangagwa, Emmerson (or Emerson) Dambudzo, Minister of</p> | <p>Rural Housing and Social Amenities (former Speaker of Parliament)</p> <p>172. Mnangagwa, Farai</p> <p>173. Mohadi, Kembo Campbell Dugishi, Minister for Home Affairs (former Deputy Minister of Local Government, Public Works and National Housing)</p> <p>174. Mombeshora, Swithun, Transport and Communications Minister</p> <p>175. Mombeshora, Millicent Sibongile, Division Chief, Head of Strategic Planning and Special Projects, Reserve Bank of Zimbabwe</p> <p>176. Moyo, Gilbert, War veteran, leader of ZANU-PF militia</p> <p>177. Moyo, Headman, ZANU-PF Provincial Chairman, Matabeleland North</p> <p>178. Moyo, Jonathan Nathaniel, Former Minister for Information and Publicity</p> <p>179. Moyo, July Nathaniel (aka July Gabarari), Former Minister of Energy and Power Development and former Minister for Public Service, Labour and Social Welfare</p> <p>180. Moyo, Mike, War Veterans National Sec. For Security</p> <p>181. Moyo, Musa, ZANU-PF Politburo Committee Member</p> <p>182. Moyo, Onemiso, General Manager - Mineral Marketing Corporation of Zimbabwe</p> <p>183. Moyo, Sibusio Bussie, Brigadier General, Zimbabwe National Army</p> <p>184. Moyo, Simon Khaya, Former ZANU-PF Politburo Deputy-Secretary for Legal Affairs, Ambassador to South Africa</p> <p>185. Mpabanga, S., Lieutenant Colonel, Mwenezi East</p> <p>186. Mpofu, Obert Moses, Minister of Industry and International Trade, former Provincial Governor,</p> |
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- Matabeleland North, ZANU-PF
Politburo Deputy-Secretary for
National Security
187. Mpofu, Rido, ZANU-PF
Provincial Chairman, Matabeleland
South
 188. Msika, Joseph W., Vice
President
 189. Msika, Maria
 190. Msipa, Cephas George, Former
Provisional Governor, Midlands
 191. Msipa, Charlotte (or Sharlottie),
Spouse of Cephas Msipa
 192. Mubaiwa, Richard, CEO-
Zimbabwe Investment Centre
 193. Muchechetere, Happison, Acting
Chief Executive of Zimbabwe
Broadcasting Corporation
 194. Muchena, Henry, Air Vice
Marshal, Midlands
 195. Muchena, Olivia Nyembesi (aka
Nyembezi), Minister of State for
Science and Technology in the
President's Office, former Minister of
State in Vice-President Msika's
Office
 196. Muchinguri (aka MUCHINGURI)
Oppah Chamu Zvipange, ZANU-PF
Politburo Secretary for Gender and
Culture, former Minister for Women's
Affairs, Gender and Community
Development, Politburo Secretary for
Gender and Culture
 197. Muchinguri, Tapiwa Rushesha
 198. Muchono, C., Lieutenant
Colonel, Mwenezi West
 199. Mudede, Tobias (or Tobaiwa)
aka Tonnetth, Registrar General
 200. Mudenge, Stan, aka Isaak (or
Isack) Stanilaus Goreraivo, Minister
of Higher and Tertiary Education
(former Minister of Foreign Affairs)
 201. Mudonhi, Columbus Assistant
Inspector, Zimbabwe Republic Police
(or Zimbabwe National Army)
 202. Mudzvova, Paul Sergeant
 203. Mugabe, Grace Spouse of
Robert Mugabe
 204. Mugabe, Leo Director of
Zimbabwe Defence Industries,
Businessman and nephew of Robert
Mugabe, President, Republic of
Zimbabwe
 205. Mugabe, Robert Gabriel,
President
 206. Mugabe, Sabina, ZANU-PF
Politburo Senior Committee Member
 207. Mugariri, Bothwell, Former
Senior Assistant Police
Commissioner, Commanding Officer,
Harare Province
 208. Muguti, Edwin, Deputy Minister
of Health and Child Welfare
 209. Mujuru, Joyce Teurai Ropa,
Vice-President, former Minister of
Water Resources and Infrastructural
Development
 210. Mujuru, Solomon Tapfumaneyi
Ruzambo (or T.R) (aka Rex Nango)
ZANU-PF Politburo Senior
Committee Member (former
Commander, Zimbabwe Defence
Forces)
 211. Mukome, Petty Chipso, ZEC
Senior Constituency Officer
 212. Mukondiwa, Pascal
 213. Mukosi, Musoro Wegomo,
Producer with Zimbabwe
Broadcasting Corporation
 214. Mumba, Isaac, Superintendent,
Zimbabwe Republic Police
 215. Mumbengegwi, Samuel
Creighton, Former Minister of
Finance (former Minister for
Indigenization and Empowerment)
 216. Mumgengegwi (or
MUMBENGEGWI), Simbarashe
Simbanenduku (aka Sekeramayi),
Minister for Foreign Affairs
 217. Mumgengegwi, (or
Mumbengegwi) Emily

218. Mupfumira, Prisca, Chairperson, Minerals Marketing Corporation of Zimbabwe Murerwa (aka Murerwas), Herbert Muchemwa Former Minister of Finance
219. Murerwa, Ruth Atipo (or Chipo), Spouse of Herbert Murerwa
220. Muringani, Willie, Chairperson, Zimbabwe National Water Authority
221. Musariri, Munyaradzi, Assistant Police Commissioner
222. Mushayakarara, Elisha, CEO, Zimbabwe Financial Holding Company
223. Mushohwe, Christopher Chindoti, Provincial Governor, Manicaland, former Minister of Transport and Communications
224. Mutasa, Didymus Noel Edwin Minister of State for National Security, Land Reform and Resettlement in the Office of the President, ZANU-PF, Secretary for Administration
225. Mutasa, Gertrude, Colonel, Zimbabwe Defence Force and spouse of Didymus Mutasa
226. Mutasa, Justin Mutsawehuni, Chairman Zimbabwe Broadcasting Holdings, CEO Zimbabwe Newspapers Group
227. Mutemachani, G. T.
228. Mutezo, Munacho Thomas Alvar, Former Minister of State for Water Resources and Infrastructural Development
229. Mutinhiri, Abros (Ambros aka Ambrose), Minister of Youth Development, Gender and Employment Creation, Retired Brigadier
230. Mutinhiri, Tracey Deputy Minister of Indigenization and Empowerment (former Deputy Speaker of the Senate)
231. Mutiwekuziva, Kenneth Kaparadza Former Deputy Minister of Small and Medium Enterprises, Development and Employment Creation
232. Mutsvunguma, S., Colonel, Headlands
233. Muvuti, Samuel Tendai, Acting CEO, Grain Marketing Board
234. Muwandi, Jason Njodzi, ZEC Senior Constituency Officer
235. Muzenda, Tsitsi V., ZANU-PF Politburo Senior Committee Member
236. Muzonzini, ElishaM Brigadier, former Director-General, Central Intelligence Organisation
237. Mwale, Joseph, CIO official
238. Mzembi, Walter, Deputy Minister of Water Resources and Infrastructural Development
239. Mzilikazi, Morgan S., Colonel (MID), Buhera Central
240. Ncube, Abedinico, Deputy Minister of Public Service, Labour and Social Welfare (former Deputy Minister of Foreign Affairs)
241. Ncube, Vivian, Commissioner - Zimbabwe Electoral Commission
242. Ndlovu, Andrew, War Veteran National Secretary for Projects
243. Ndlovu, Callistus, Chairman, Net*One
244. Ndlovu, Prof. Lindela Chairperson, Cold Storage Corporation
245. Ndlovu, Naison K., Deputy President of the Senate, and ZANU-PF Politburo Secretary for Production and Labour
246. Ndlovu, Richard, ZANU-PF Politburo Deputy Commissariat
247. Ndlovu, Rose Jaele, Spouse of Sikhanyisu Ndlovu
248. Ndlovu, Sikhanyisu (or Sikhanyiso) Duke, ZANU-PF Politburo Secretary for Education,

- former Minister of Information and Publicity, former Deputy Minister of Higher and Tertiary Education
249. Nerwande, Elizabeth, CEO, ZIMTRADE
 250. Nguni, Sylvester Robert, Minister of Economic Development (former Deputy Minister of Agriculture)
 251. Nhandara, Handson, ZEC Senior Constituency Officer
 252. Nhema, Francis Chenayaimoyo Dunstan, Environment and Tourism Minister
 253. Nherera, Prof. Charles, Former Chairman Zimbabwe United Passenger Company
 254. Nkala, Herbert, Chairman, Zimbabwe Newspapers Ltd. and Chair, First Banking Corporation
 255. Nkomo, Georgina Ngwenya, Spouse of John Nkomo
 256. Nkomo, John Landa, Former Speaker of House of Assembly, former Minister of Special Affairs in the President's Office and National Chairman of ZANU-PF
 257. Nkomo, Louise S. (aka Nhema, Louise Sehulle), Spouse of Frances Nhema
 258. Nsimbi, Zenzo, Former Zanu-PF Politburo Member, former Provincial Governor, Bulawayo
 259. Nyambuya, Michael Reuben, Former Minister of Energy and Power Development, former Lieutenant General, Provincial Governor, Manicaland
 260. Nyangulu, Nyepudazai, Chair, Traffic Safety Council of Zimbabwe (TSCZ)
 261. Nyanhongo, Hubert Magadzire (or Magadzire Hubert), Deputy Minister of Transport and Communications
 262. Nyathi, George, ZANU-PF Politburo Deputy Secretary of Science and Technology
 263. Nyawani, Misheck, Retired, Superintendant
 264. Nyikayaramba, Douglas, Brigadier General, Mashonaland East, Executive Secretary of Election Supervisory Commission
 265. Nyoni, Peter Baka, Spouse of Sithembiso Nyoni
 266. Nyoni, Sithembiso Gile Glad, Minister of Small and Medium Enterprise Development and Employment Creation
 267. Nzuwa, Mariyawanda Parirenyatwa, Choice Spouse of David Parirenyatwa
 268. Parirenyatwa, David Pagwese, Minister of Health and Child Welfare (former Deputy Minister, Health and Child Welfare)
 269. Passaportis, Rick, Businessman
 270. Patel, Bharat Former Acting Attorney-General, Justice
 271. Patel, Khantibal (or Khantibhal), ZANU-PF Politburo Deputy Secretary of Finance
 272. Pfidze, Luwiza China, ZEC Senior Constituency Officer
 273. Pote, Selina (or Celine) M., ZANU-PF Politburo Deputy-Secretary for Gender and Culture
 274. Ramakgapoia, Loud, ZEC Senior Constituency Officer
 275. Rangwani, Dani, Police Detective Inspector
 276. Rautenbach (or Rautenback) Muller Conrad (aka Wilhelm or Billy), Businessman
 277. Ravasingadi, Lingwe, ZEC Senior Constituency Officer
 278. Rugeje, Engelbert Abel, Major General, Masvingo Province

279. Rungani, Victor TC Colonel, Chikomba, Brigadier General (Retired)
280. Rusere, Rinos (or Tinos or Tino), Deputy Minister of Mines and Mining Development (former Deputy Minister for Water Resources and Infrastructure Development)
281. Ruwodo, Richard, Former Brigadier General, Major General (retired), former Acting Permanent Under Secretary for Ministry of Defence
282. Sakabuya, Morris, Deputy Minister of Local Government, Public Works and Urban Development
283. Sakupwanya, Stanley, ZANU-PF Politburo Deputy-Secretary for Health and Child Welfare
284. Samkange, Nelson Tapera Crispen (or Crispin), Former Provisional Governor: Mashonaland West
285. Sandi (aka Sachi), E., Former ZANU-PF Politburo Deputy Secretary of Home Affairs, ZANU-PF Politburo Deputy Secretary for Women's Affairs
286. Savanhu, Tendai, ZANU-PF Politburo Deputy Secretary of Transport and Social Welfare
287. Sekeramayi, Lovemore, Chief Election Officer - Zimbabwe Electoral Commission
288. Sekeramayi, Sydney (or Sidney) Tigere, Minister of Defence
289. Sekeramayi (aka Sekeramayi), Tsitsi Chihuri, Spouse of Sydney Sekeramayi
290. Shamu, Webster Kotiwani, ZANU-PF Politburo Minister of State for Policy Implementation in the President's Office
291. Shamuyarira, Dorothy
292. Shamuyarira, Nathan Marwirakuwa, Secretary for Information and Publicity
293. Shangahaidonhi, Cosmas, ZEC Senior Constituency Officer
294. Shiri, Perence (aka Bigboy Samson Chikerema), Air Marshal (Air Force)
295. Shumba, Isaiah Masvayamwando, Deputy Minister, Education, Sports and Culture
296. Shungu, Etherton Shungu, Brigadier General, Mashonaland Central
297. Sibanda, Chris, Colonel, Bulawayo Province
298. Sibanda, Jabulani, Former Chair, National War Veterans Association
299. Sibanda, Levy Deputy Police Commissioner
300. Sibanda, Misheck Julius Mpande, Cabinet Secretary
301. Sibanda, Phillip Valerio (Valentine), Commander, Zimbabwe National Army, Lieutenant General
302. Sigauke, David, Brigadier General, Mash West Province
303. Sikhosana (or Sikosana) Absolom, ZANU-PF Politburo Secretary for Youth Affairs
304. Silukhumi, Naneti, Second spouse of Ignatius Chombo
305. Siyachitema, Jonathon Commissioner, Zimbabwe Electoral Commission
306. Stamps, Cindy Elaine, Businesswoman
307. Stamps, Timothy, Health Advisor in the Office of the President, former Health Minister
308. Takavarasha, Dr. Tobias CEO, Agricultural and Rural Development Authority
309. Takawira, Amod, CEO, National Social Security Authority

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| 310. Tanwengwa, Solomon aka Tawengwa, Solomon Chirume, Deputy-Secretary for Finance | 321. Veterai, Edmore, Senior Assistant Police Commissioner, Commanding Officer, Harare |
| 311. Tarumbwa, Nathaniel Charles, Brigadier General, Manicaland and Mutare South | 322. Whabira, Job |
| 312. Thackay, Monty, Businessman | 323. Zambuko, Sabastian, ZEC Senior Constituency Officer |
| 313. Tomana, Johannes, Attorney General | 324. Zenzo, Nsimbi, Former ZANU-PF Politburo Provincial Chairman, Bulawayo |
| 314. Tonderai (aka Matibiri), Innocent, Deputy Police Commissioner | 325. Zhou, Tazviona, ZEC Senior Constituency Officer |
| 315. Tshawe, Jabulani, ZANU-PF Politburo Provincial Chairman Bulawayo | 326. Zhuwao, Beauty Lily, Spouse of Patrick Zhuwao |
| 316. Tumisang, Tabela, ZEC Senior Constituency Officer | 327. Zhuwao, Patrick, Deputy Minister of Science and Technology and nephew of Robert Mugabe |
| 317. Tungamirai, Josiah T., Secretary for Empowerment and Indigenization | 328. Zhuwarara, Rino |
| 318. Udenge, Samuel, Minister of State for State Enterprises, Anti-Monopolies and Anti-Corruption (former Deputy Minister of Economic Development) | 329. Zimonte, Paradzai (aka Zimondi, Paradzai), Prisons Director |
| 319. Utete, Charles, Chairman, Presidential Land Review Committee, former Cabinet Secretary | 330. Zindi, Fred, Chair Postal and Telecommunications Regulatory Authority of Zimbabwe |
| 320. Utete, Verna Lucy, Cabinet Secretary | 331. Zvayi, Caesar, Political and Features Editor, The Herald |
| | 332. Zvinavashe, Vitalis, Retired General, Secretary of the Politburo Committee on Indigenization and Empowerment |

SWITZERLAND

INDIVIDUALS

- | | |
|----------------------------------|---|
| 1. ABU BASUTU, Titus MJ | 13. CHIDARIKIRE, Faber Edmund |
| 2. BARWE, Reuben | 14. CHIGUDU, Tinaye |
| 3. BONYONGWE, Happyton | 15. CHIGWEDERE, Aeneas Soko |
| 4. BONYONGWE, Willa (aka Willia) | 16. CHIHOTA, Phineas |
| 5. BREDENKAMP, John Arnold | 17. CHIHURI, Augustine |
| 6. BUKA (aka BHUKA), Flora | 18. CHIHURI, Isobel (aka Isabel) Halima |
| 7. BVUDZIJENA, Wayne | 19. CHIMBUDZI, Alice |
| 8. CHAIRUKA, Annie Flora Imagine | 20. CHIMEDZA, Paul |
| 9. CHAPFIKA, David | 21. CHIMUTENGWENDE, Chenhamo Chekezha |
| 10. CHARAMBA, George | 22. CHINAMASA, Monica |
| 11. CHARAMBA, Rudo Grace | 23. CHINAMASA, Patrick Anthony |
| 12. CHARUMBIRA, Fortune Zefanaya | |

24. CHINDORI-CHININGA, Edward Takaruza
25. CHINGOKA, Peter Farai
26. CHINOTIMBA, Joseph
27. CHIPANGA, Tongesai Shadreck
28. CHIPWERE, Augustine
29. CHIREMBA, Mirirai
30. CHITAKUNYE, Eliphas
31. CHITEPO, Victoria
32. CHIWENGA, Constantine
33. CHIWENGA, Jocelyn
34. CHIWESHE, George
35. CHIWEWE, Willard
36. CHOMBO, Ignatius Morgan Chiminya
37. DAMASANE, Abigail
38. DEKETEKE, Pikirayi
39. DINHA, Martin
40. DOKORA, Lazarus
41. DUBE, Tshinga Judge
42. GAMBE, Theophilus
43. GEORGIAS, Aguy
44. GOCHE, Nicholas Tasunungurwa
45. GONO, Gideon
46. GONO, Helen (aka Hellin) Mushanyuri
47. GULA-NDEBELE, Sobuza
48. GUMBO, Rugare Eleck Ngidi
49. GURIRA, Cephas T.
50. GWEKWERERE, Stephen
51. HUNGWE, Josaya (aka Josiah) Dunira
52. HUNI, Munyaradzi
53. JANGARA (aka CHANGARA), Thomsen
54. KACHEPA, Newton
55. KANGAI, Kumbirai
56. KARAKADZAI, Mike Tichafa
57. KARIMANZIRA, David Ishemunyoru Godi
58. KASUKUWERE, Saviour
59. KAUKONDE, Ray Joseph
60. KAZANGARARE, Jawet
61. KAZEMBE, Joyce Laetitia
62. KEREKE, Munyaradzi
63. KHUMALO, Sibangumuzi
64. KUNONGA, Nolbert (aka Nobert)
65. KURUNERI, Christopher Tichaona
66. KWAINONA, Martin
67. KWENDA, R.
68. LANGA, Andrew
69. LESABE, Thenjiwe V.
70. MABUNDA, Musarashana
71. MACHAYA, Jason (aka Jaison) Max Kokerai
72. MADE, Joseph Mtakwese
73. MADE, Patricia A.
74. MADZONGWE, Edna (aka Edina)
75. MAHOFA, Shuvai Ben
76. MAHOSO, Tafataona
77. MAKWANYA, Judith
78. MAKWAVARARA, Sekesai
79. MALINGA, Joshua
80. MALULEKE, Titus
81. MANGWANA, Paul Munyaradzi
82. MANYONDA, Kenneth Vhundukai
83. MARUMAHOKO, Reuben
84. MASAWI, Ephraim Sango
85. MASHAVA, G.
86. MASUKU, Angeline
87. MATANYAIRE, Munyaradzi
88. MATHEMA, Cain Ginyilitshe Ndabazekhaya
89. MATHUTHU, Thokozile
90. MATIZA, Joel Biggie
91. MATONGA, Brighton
92. MATSHALAGA, Obert
93. MATSHIYA, Melusi (Mike)
94. MAVHAIRE, Dzikamai
95. MBIRIRI, Partson
96. MHANDU, Cairo (aka Kairo)
97. MHONDA, Fidellis
98. MIDZI, Amos Bernard (Mugenva)
99. MNANGAGWA, Emmerson Dambudzo
100. MOHADI, Kembo Campbell Dugishi
101. MOMBESHORA, Millicent Sibongile
102. MOYO, Gilbert
103. MOYO, Jonathan
104. MOYO, July Gabarari
105. MOYO, Sibusio Bussie
106. MOYO, Simon Khaya
107. MPABANGA, S.
108. MPOFU, Obert Moses
109. MSIPA, Cephas George
110. MUCHECHETERE, Happison
111. MUCHENA, Henry
112. MUCHENA, Olivia Nyembesi (aka Nyembezi)

113. MUCHINGURI, Oppah Chamu Zvipange
114. MUCHONO, C.
115. MUDEDE, Tobaiwa (aka Tonneth)
116. MUDENGE, Isack Stanilaus Goreraivo
117. MUDONHI, Columbus
118. MUDZVOVA, Paul
119. MUGABE, Grace
120. MUGABE, Leo
121. MUGABE, Robert Gabriel
122. MUGABE, Sabina
123. MUGARIRI, Bothwell
124. MUGUTI, Edwin
125. MUJURU, Joyce Teurai Ropa
126. MUJURU, Solomon T.R.
127. MUKOSI, Musoro Wegomo
128. MUMBA, Isaac
129. MUMBENGEGWI, Samuel Creighton
130. MUMBENGEGWI, Simbarashe Simbanenduku
131. MURERWA, Herbert Muchemwa
132. MUSARIRI, Munyaradzi
133. MUSHOHWE, Christopher Chindoti
134. MUTASA, Didymus Noel Edwin
135. MUTASA, Gertrude
136. MUTASA, Justin Mutsawehuni
137. MUTEZO, Munacho
138. MUTINHIRI, Ambros (aka Ambrose)
139. MUTINHIRI, Tracey
140. MUTIWEKUZIWA, Kenneth Kaparadza
141. MUTSVUNGUMA, S.
142. MUZENDA, Tsitsi V.
143. MUZONZINI, Elisha
144. MZEMBI, Walter
145. MZILIKAZI, Morgan S.
146. NCUBE, Abedinico
147. NDLOVU, Naison K.
148. NDLOVU, Richard
149. NDLOVU, Sikhanyiso
150. NGUNI, Sylvester
151. NHEMA, Francis
152. NKALA, Herbert
153. NKOMO, John Landa
154. NYAMBUYA, Michael Reuben
155. NYANHONGO, Magadzire Hubert
156. NYATHI, George
157. NYAWANI, Misheck
158. NYIKAYARAMBA, Douglas
159. NYONI, Sithembiso Gile Glad
160. PARIRENYATWA, Choice
161. PARIRENYATWA, David Pagwese
162. PATEL, Bharat
163. PATEL, Khantibhal
164. POTE, Selina M.
165. RANGWANI, Dani
166. RAUTENBACH, Muller Conrad (aka Billy)
167. RUGEJE, Engelbert Abel
168. RUNGANI, Victor TC
169. RUWODO, Richard
170. SAKABUYA, Morris
171. SAKUPWANYA, Stanley
172. SAMKANGE, Nelson Tapera Crispen
173. SANDI, E.
174. SAVANHU, Tendai
175. SEKERAMAYI, Sydney (aka Sidney) Tigere
176. SEKEREMAYI (aka SEKERAMAYI), Tsitsi Chihuri
177. SEREKEMAYI, Lovemore
178. SHAMU, Webster Kotiwani
179. SHAMUYARIRA, Nathan Marwirakuwa
180. SHIRI, Perence (aka Bigboy Samson Chikerema)
181. SHUMBA, Isaiah Masvayamwando
182. SHUNGU, Etherton
183. SIBANDA, Chris
184. SIBANDA, Jabulani
185. SIBANDA, Misheck Julius Mpande
186. SIBANDA, Phillip Valerio (aka Valentine)
187. SIGAUKE, David
188. SIKOSANA, Absalom
189. STAMPS, Timothy
190. TARUMBWA, Nathaniel Charles
191. TOMANA, Johannes
192. TONDERAI MATIBIRI, Innocent
193. UDENGE, Samuel
194. UTETE, Charles
195. VETERAI, Edmore
196. ZHUWAO, Patrick
197. ZIMONDI, Paradzai

198. ZVAYI, Caesar

ENTITIES

1. Alpha International (PVT) Ltd
2. Breco (Asia Pacific) Ltd
3. Breco (Eastern Europe) Ltd
4. Breco (South Africa) Ltd
5. Breco (UK) Ltd
6. Breco Group
7. Breco International
8. Breco Nominees Ltd
9. Breco Services Ltd
10. Cold Comfort Farm Trust Co-operative
11. Comoil (PVT) Ltd
12. Corybantes Ltd
13. Divine Homes (PVT) Ltd
14. Echo Delta Holdings
15. Famba Safaris
16. Jongwe Printing and Publishing Company (PVT) Ltd (aka Jongwe Printing and

- Publishing co., aka Jongwe Printing and Publishing Company)
17. M & S Syndicate (PVT) Ltd
18. Masters International Ltd
19. Ndlovu Motorways
20. OSLEG Ltd (aka Operation Sovereign Legitimacy)
21. Piedmont (UK) Ltd
22. Raceview Enterprises
23. Ridgepoint Overseas Developments Ltd
24. Scottlee Holdings (PVT) Ltd
25. Scottlee Resorts Ltd
26. Swift Investments (PVT) Ltd
27. Timpani Export Ltd
28. Tremalt Ltd
29. Zidco Holdings (aka Zidco Holdings (PVT) Ltd)
30. Zimbabwe Defence Industries
31. Zimbabwe Mining Development Corporation

UNITED STATES OF AMERICA

INDIVIDUALS

1. Robert Gabriel Mugabe, *President of Zimbabwe*
2. Flora Buka, *Minister of State for Special Affairs, Land and Resettlement Program*
3. Abina Chapfika, *Spouse of David Chapfika*
4. David Chapfika, *Deputy Minister of Finance*
5. George Charamba, *Permanent Secretary, Ministry of Information and Publicity*
6. Rudo Grace Charamba, *Spouse of George Charamba*
7. Fortune Zefanaya Charumba, *Member of Parliament & Central Committee Member*
8. Tinaye Elisha Nzirasha Chigudu, *Manicaland Provincial Governor*
9. Aeneas Soko Chigwedere, *Minister of Education, Sports and Culture*
10. Phineas Chihota, *Deputy Minister of Industry and International Trade*
11. Augustine Chihuri, *Police Commissioner*
12. Enos Chikowore, *Former Central Committee Member*
13. Chenhamo Chakezha Chen Chimutengwende, *Minister of State for Public and Interactive Affairs*
14. Gamuchirai Chinamasa, *Child of Patrick Chinamasa*
15. Monica Chinamasa, *Spouse of Patrick Chinamasa*
16. Patrick Chinamasa, *Minister of Justice, Legal and Parliamentary Affairs*
17. Edward Chindori-Chininga, *Member of Parliament for Guruve South*
18. Victoria Chitepo, *Politburo*
19. Constantine Gureya Chiwenga, *Lt. Gen., Commander of Zimbabwe Defense Forces*

20. Jocelyn Mauchaza Chiwenga, *Spouse of Constantine Chiwenga*
21. George Chiweshe, *Chairman of Zimbabwe Electoral Commission*
22. Willard Chiwewe, *Masvingo Provincial Governor*
23. Ever Chombo, *Spouse of Ignatius Chombo*
24. Ignatius Morgan Chombo, *Minister of Local Government, Public Works and National Housing*
25. Marian Chombo, *Spouse of Ignatius Chombo*
26. Dumiso Dabengwa, *Politburo Committee Member*
27. Ijeoma Dabengwa, *Child of Dumiso Dabengwa*
28. Abigail Damasane, *Deputy Minister for Women's Affairs, Gender, and Community Development*
29. Theophilus Pharaoh Gambe, *Chairman, Electoral Supervisory Commission*
30. Nicholas Tasunungurwa Goche, *Minister of Public Works, Labor and Social Welfare*
31. Gideon Gono, *Governor of the Reserve Bank of Zimbabwe*
32. Hellin Mushanyuri Gono, *Spouse of Gideon Gono*
33. Aleck Rugare Ngidi Gumbo, *Minister for Economic Development*
34. Richard Chemist Hove, *Politburo Secretary for Economic Affairs*
35. Tichaona Joseph Benjamin Jokonya, *Minister of Information and Publicity*
36. Kumbirai Kangai, *Politburo Deputy Secretary for External Relations*
37. Ray Joseph Kaukonde, *Mashonaland East Provincial Governor*
38. David Karimanzira, *Harare Provincial Governor & Politburo Secretary for Finance*
39. Savior Kasukuwere, *Deputy Minister for Youth Development and Employment Creation & Deputy Secretary for Youth Affairs*
40. Andrew Langa, *Deputy Minister of Environment and Tourism*
41. Thenjiwe Lesabe, *Politburo Committee Member*
42. Jaison Max Kokerai Machaya, *Member of Parliament for Gokwe Kana*
43. Joseph Mtakwese Made, *Minister of Agriculture*
44. Edna Madzongwe, *Deputy Speaker of Parliament*
45. Shuvai Ben Mahofa, *Member of Parliament for Gutu South*
46. Joshua Malinga, *Deputy Secretary for Disabled and Disadvantaged*
47. Barbara Mandizha, *Deputy Police Commissioner*
48. Munyaradzi Paul Mangwana, *Minister of State for Anti-Corruption and Anti-Monopolies*
49. Witness Mangwende, *Former Minister of Transport and Communications*
50. Elliot Manyika, *Minister Without Portfolio*
51. Kenneth Manyonda, *Central Committee Member*
52. Rueben Marumahoko, *Deputy Minister for Home Affairs*
53. Angeline Masuku, *Matabeleland South Provincial Governor & Politburo Secretary for Gender and Culture*
54. Godwin Matanga, *Deputy Police Commissioner*
55. Cain Mathema, *Bulawayo Provincial Governor*
56. Sithokozile Mathuthu, *Matabeleland North Provincial Governor & Deputy Secretary for Transport and Social Welfare*
57. Innocent Tonderai Matibiri, *Deputy Police Commissioner*
58. Biggie Joel Matiza, *Deputy Minister of Rural Housing and Social Amenities*
59. Bright Matonga, *Deputy Minister of Information and Publicity*
60. Obert Matshalaga, *Deputy Minister of Foreign Affairs*

61. Amos Bernard Muvenga Midzi, *Minister of Mines and Mining Development*
62. Emmerson Dambudzo Mnangagwa, *Minister of Rural Housing and Social Amenities*
63. Kembo Campbell Dugishi Mohadi, *Minister of Home Affairs*
64. Swithun Mombeshora, *Former Minister of Higher Education*
65. Jonathan Nathaniel Moyo, *Member of Parliament for Tsholotsho & Former Minister of Information and Publicity*
66. Simon Khaya Moyo, *Politburo*
67. Obert Moses Mpfu, *Deputy Secretary for National Security*
68. Joseph Msika, *First Vice President*
69. Cephas George Msipa, *Midlands Provincial Governor*
70. Sharlottie Msipa, *Spouse of Cephas Msipa*
71. Olivia Nyembezi Muchena, *Minister of State for Science and Technology Development*
72. Natasha Muchinguri, *Child of Oppah Muchinguri*
73. Oppah Chamu Zvipange Muchinguri, *Minister of Women's Affairs, Gender and Community Development*
74. Tanya Muchinguri, *Child of Oppah Muchinguri*
75. Isack Stan Goreraivo Mudenge, *Minister of Higher and Tertiary Education*
76. Grace Mugabe, *Spouse of Robert Mugabe*
77. Sabina Mugabe, *Politburo Senior Committee Member*
78. Edwin Muguti, *Deputy Minister of Health and Child Welfare*
79. Joyce Teurai Ropa Mujuru, *Second Vice President*
80. Solomon Tapfumaneyi Ruzambo Mujuru (a.k.a. Rex Nango), *Politburo Senior Committee Member*
81. Samuel Simbarashe Simbanenduku Mumbengegwi, *Non-Constituency Member of Parliament*
82. Herbert Muchemwa Murerwa, *Minister of Finance*
83. Ruth Chipso Murerwa, *Child of Herbert Murerwa*
84. Christopher Chindoti Mushohwe, *Minister of Transport and Communications*
85. Didymus Noel Edwin Mutasa, *Minister of State for National Security*
86. Munacho Thomas Alvar Mutezo, *Minister of Water Resources and Infrastructural Development*
87. Ambrose Mutinhiri, *Minister of Youth Development and Employment Creation*
88. Kenneth Keparadza Mutiwekuziva, *Deputy Minister for Small and Medium Enterprise Development*
89. Simon Vengesai Muzenda, *Former Vice President*
90. Tsitsi Muzenda, *Politburo Senior Committee Member*
91. Elisha Muzonzini, *Former Director of the Central Intelligence Organization*
92. Abedinico Ncube, *Deputy Minister of Public Service, Labor and Social Welfare*
93. Naison K. Ndlovu, *Politburo Secretary for Production and Labor*
94. Richard Ndlovu, *Politburo Deputy Commissariat*
95. Rose Jaele Ndlovu, *Spouse of Sikhanyiso Ndlovu*
96. Sikhanyiso Duke Ndlovu, *Deputy Minister of Higher and Tertiary Education*
97. Sylvester Robert Nguni, *Deputy minister of Agriculture*
98. Chenayaimoyo Dunstan Francis Nhema, *Minister of Environment and tourism*
99. Georgina Ngwenya Nkomo, *Spouse of John Nkomo*
100. John Landa Nkomo, *Speaker of Parliament & ZANU-PF National Chairman*
101. Louise S. Nkomo (a.k.a. Louise Sehulle Nhema), *Spouse of Francis Nhema*
102. Stephen Nkomo, *Former Politburo Senior Committee Member*

103. Michael Rueben Nyambuya, *Minister of Energy and Power Development*
104. Peter Baka Nyoni, *Spouse of Sithembiso Nyoni*
105. Sithembiso Nyoni, *Minister of Small and Medium Enterprises Development*
106. David Pagwese Parirenyatwa, *Minister of Health and Child Welfare*
107. Khantibhal Patel, *Politburo Deputy Secretary for Finance*
108. Selina Pote, *Deputy Secretary for Gender and Culture*
109. Tinos Rusere, *Deputy Minister of Mines and Mining Development*
110. Morris Sakabuya, *Deputy Minister of Local Government, Public Works, and Urban Development*
111. Stanley Sakupwanya, *Deputy Secretary for Disabled and Disadvantaged*
112. Tendai Savanhu, *Politburo Deputy Secretary of Transport and Social Welfare*
113. Lovemore Sekeramayi, *Chief Elections Officer*
114. Sidney Tigere Sekeramayi, *Minister of Defense*
115. Tsitsi Chihuri Sekeramayi, *Spouse of Sydney Sekeramayi*
116. Webster Kotiwani Shamu, *Minister of Policy Implementation*
117. Nathan Marwirakuwa Shamuyarira, *Politburo Secretary for Information and Publicity*
118. Perence Shiri, *Zimbabwean Air Marshal (Air Force)*
119. Isaiah Masvayamwanda Shumba, *Deputy Minister for Education, Sports and Culture*
120. Levy Sibanda, *Deputy Police Commissioner*
121. Absolom Sikosana, *Politburo Secretary for Youth Affairs*
122. Solomon Tawengwa, *Former Executive Mayor of Harare*

123. Josiah Tungamirai, *Former Minister of State for Indigenization and Empowerment*
124. Charles Manhamu Utete, *Former Cabinet Secretary*
125. Beauty Liily Zhuwao, *Spouse of Patrick Zhuwao*
126. Patrick Zhuwao, *Deputy Minister of Science and Technology*
127. Paradzai Zimondi, *Zimbabwe Prisons chief*
128. Vitalis Zvinavashe, *Politburo Member & Retired Commander of Zimbabwe Defense Forces*

ENTITIES

1. Allan Grange Farm
Chegutu, ZW
2. Auchenburg Farm
Nyamandlovu, ZW
3. Bamboo Creek Farm
Shamva, ZW
4. Bourne Farm
Chegutu, ZW
5. Calgary Farm
Mazowe, ZW
6. Cold Comfort Farm Trust Co-Operative
Harare, ZW
7. Corburn 13 Farm
Chegutu, ZW
8. Duiker Flats Farm
ZW
9. Eirin Farm
Marondera, ZW
10. Eyrie Farm
Mashvingo, ZW
11. Fountain Farm
Insiza, ZW
12. Gowrie Farm
Norton, ZW
13. Harmony Farm
Mazowe, ZW
14. Little Connemara 1 Farm
Nyanga, ZW
15. Lochinvar Farm

Mashvingo, ZW

16. Longwood Farm

ZW

17. Lot 3A of Dete Valley Farm

Lupane, ZW

18. Lothain Farm

Gutu, ZW

19. M & S Syndicate (Pvt) Ltd.

Harare, ZW

20. Marondera Maple Leaf Farm

ZW

21. Ndlovu Motorways

Harare, ZW

22. Oldham Farm

Chegutu, ZW

23. Patterson Farm

Mazowe, ZW

24. Pimento Farm

Mashonaland, ZW

25. R/E of Audrey Farm

ZW

26. R/E of Mlembwe Farm

Mlembwe, ZW

27. Spring SP Farm

Mashvingo, ZW

28. Subdivision 3 of Caledon Farm

Caledon, ZW

29. Swift Investments (Pvt) Ltd.

Harare, ZW

30. Ulva Farm

Marondera, ZW

31. Umguza Block Farm

Umguza, ZW

32. Zimbabwe Defence Industries (Pvt) Ltd.

Harare, ZW

33. Zvinavashe investments Ltd. (a.k.a.

Lamfontine Farm; a.k.a. Zvinavshe

Transport)

Harare, ZW

PROHIBITED TRANSACTIONS

Prohibits U.S. persons, wherever located, or anyone in the U.S. from engaging in any transactions with any person, entity or organization found to:

- 1) be undermining democratic institutions and processes in ZW
- 2) have materially assisted, sponsored, or provided financial, material, or technological support to these entities
- 3) be or have been an immediate family member of a sanctions target
- 4) be owned, controlled or acting on behalf of a sanctions target.

Prohibited transactions include, but are not limited to, exports (direct and indirect), imports (direct and indirect), trade brokering, financing and facilitation, as well as most financial transactions. These prohibitions also extend to any person, organization or entity found to be owned, controlled or acting on behalf of any ZW entity included on the SDN list.

Under the Executive Order, U.S. persons are also required to block any property of an ZW Specially Designated Nationals that is in the U.S., that comes into the U.S., or that comes under the control of a U.S. person wherever located. The term property includes, but is not limited to, money, checks, drafts, bank accounts, securities and other financial instruments, letters of credit, bills of sales, bills of lading and other evidences of title, wire transfers, merchandise and goods. Blockable property also includes any property in which there is any interest of a ZW SDN, including direct, indirect, future, or contingent, and tangible or intangible interests.