



DIGITAL RIGHTS AND INCLUSION IN AFRICA REPORT

ZAMBIA
COUNTRY REPORT

2024

Executive Summary

The Londa Zambia report assesses key developments which have taken place in Zambia's Information and Communications Technology and human rights space in 2024. The report covers thematic areas including, but not limited to, online freedom of expression, data protection, cybersecurity, and digital inclusion. It also reviews the implementation of the Universal Access and Service Fund. The report was compiled through a combination of desktop research, quantitative research, as well as discussions with experts. This year's edition is also bolstered by the introduction of Paradigm Initiative's proprietary *TheScore Index*, which assesses Zambia's compliance with human rights considerations guided by the African Commission on Human and Peoples' Rights' *Declaration of Principles on Freedom of Expression and Access to Information*.

In 2024, the period under review, the ICT sector witnessed some key developments. These include the launch of a fourth mobile phone operator, Zed Mobile, which committed to an investment of US\$400 into its operations. The Ministry of Technology and Science launched the long-awaited National Artificial Intelligence Policy and the sector also continued to attract attention from global sources, with Google Cloud committing to establish a Centre of Excellence in Zambia, for example. Overall, the use of mobile and internet services continued a positive trajectory in the period under review, with more individuals gaining access to services.

However, concerns also abounded in the period under review, with the increasing arrests of opposition leaders, journalists, and civil rights activists on charges ranging from sedition to hate speech. The government also advanced its attempts to pass Cybersecurity and Cyber Crimes Bills which have been cautioned by civil society and human rights defenders, to contain human rights violating provisions



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Zambia is a land-locked Southern African country, sharing its borders with eight countries comprising Angola, Tanzania, Zimbabwe, Namibia, the Democratic Republic of Congo, Mozambique, Malawi, and Botswana.¹⁴⁴³ The country's economy is heavily reliant on mining, a significant contributor to its gross domestic product (GDP) which stood at \$27.6 billion in 2023, tax revenues and export earnings.¹⁴⁴⁴ The Agriculture sector is also a mainstay, employing over 70% of Zambia's population.¹⁴⁴⁵ Zambia is a stable democracy, characterised by relatively peaceful elections and power handovers. The current president, Hakainde Hichilema, and his United Party for National Development (UPND) entered into power in August 2021 after a sixth attempt at the presidency.¹⁴⁴⁶ This win was largely driven by support from the country's youths as Hakainde gained popularity from a pledge to improve the country's socio-economic growth trajectory impacted by years of economic decline and political mismanagement.

However, the economic turnaround has been slow to materialise with many of the country's population living in poverty as heightened inflation and weakened consumer spending power contribute to growing citizen dissatisfaction. Against this backdrop, the country is also approaching presidential elections in August 2026, which has seen tensions ratchet up between the incumbent and opposition parties.¹⁴⁴⁷

Zambia scores 45 out of 60 on Paradigm Initiative's TheScore Index. This is a digital rights index which evaluates the compliance of the country with key human rights elements and is guided by the African Commission on Human and Peoples' Rights' Declaration of Principles on Freedom of Expression and Access to Information.

Zambia's eighth National Development Plan identifies Information and Communication Technologies (ICTs) as a vital part of driving the country's economic transformation. However it also concedes that factors such as limited infrastructure, low digital skills, and restricted access to ICT devices¹⁴⁴⁸ have contributed to the challenges facing the sector.

A number of institutions and actors play a role in Zambia's ICT sector. Chief of these is the Ministry of Technology and Science which oversees ICT policy development and implementation while the Zambia Information and Communications Authority (ZICTA) is the sector regulator. The Electronic Government (e-Gov) Division also known as the Smart Zambia Institute was established by Hichilema's signing of the Commencement Order for the Electronic Government Act No. 41 of 2021. The Institute is responsible for the management and promotion of electronic Government services and processes for the improvement of public service delivery.¹⁴⁴⁹ It is guided by the National Electronic Government Plan 2023 - 2026 which sets out a foundation for enhanced service delivery, accessibility, transparency, and efficiency between the government and citizens and the private sector.

Zambia's ICT landscape is also shaped by a number of laws as well as critical policies such as the National ICT Policy 2023, the National Digital Transformation Strategy 2023 - 2027, the National ICT Policy Implementation Strategy 2022 - 2026 and Strategic Plan 2022- 2026.¹⁴⁵⁰

1443 World Atlas 'Which Countries Border Zambia' (2025) <https://www.worldatlas.com/articles/what-countries-border-zambia.html> (accessed on 13 October 2024).

1444 PwC 'Zambia 2024 Mining Report' (2024) <https://www.pwc.com/zm/en/publications/zambia-mining-report.html#:~:text=The%20min-ing%20sector%20continues%20to%20be%20a%20cornerstone,domestic%20product%20%28GDP%29%2C%20tax%20revenues%20and%20export%20earnings> (accessed on 30 October 2024).

1445 International Monetary Fund 'Boosting Productivity and Enhancing Climate Resilience in Zambia's Agriculture Sector' (2023) <https://www.elibrary.imf.org/view/journals/002/2023/257/article-A003-en.xml> (accessed on 3 November 2024).

1446 BBC 'Zambia election: Hakainde Hichilema beats President Edgar Lungu' (2021) <https://www.bbc.com/news/world-africa-58226695> (accessed on 30 October 2024).

1447 Bulawayo 24 News 'Edgar Lungu, the Tonse Coalition, and Zambia's political landscape: A clash of visions ahead of the 2026 elections' (2024), (accessed 27 November 2024).

1448 Ministry of Finance and National Planning '8NDP (2022-2026)' <https://www.mofnp.gov.zm/?wpdmpo=8ndp-2022-2026>

1449 Smart Zambia Institute <https://www.szi.gov.zm/> (accessed on 21 November 2024)

1450 Kalembe 'Mutati launches ICT policy, digital transformation strategic plan' (2023) <https://kalembe.news/busi ness/2023/10/14/muta-ti-launches-ict-policy-digital-transformation-strategic-plan/> (accessed 11 November 2024).

Internet access

As of mid-2024, Zambia had 21.9 million mobile SIM cards representing year-on-year growth of 8.9% and a penetration rate of 109.2%, according to official data from ZICTA. The number of internet subscriptions also grew by 10.2% from 2023, to 12.6 million, representing 64.1% of the country's population. By the end of June 2024, there were 93 valid licenses in the ICT sector, an increase from 89 the previous year.¹⁴⁵¹ In terms of affordability of connectivity services, Zambia's cost of data services can be considered relatively prohibitive, especially when considering the high cost of living in the country. Living cost estimates Zambia's average monthly cost of living for one person to stand at \$852,¹⁴⁵² in comparison to an average monthly salary of ZMW6000 (\$212) per month.¹⁴⁵³ According to the latest available data, Cable.co.uk's Worldwide Mobile Data Pricing 2022 report found that the average price of one gigabyte of data costs \$8.01.¹⁴⁵⁴ Data from the same firm also found that the average cost of monthly broadband in the country stood at USD 44.63 compared to Sub-Saharan Africa's USD 62.66 for the year 2024.

Freedom of expression

The National Constitution 2016¹⁴⁵⁵, affirms the right to freedom of expression¹⁴⁵⁶, assembly and association¹⁴⁵⁷, access to information¹⁴⁵⁸, and privacy.¹⁴⁵⁹ Zambia is also a signatory of regional and global human rights instruments that affirm freedom of expression online and offline, including cybersecurity and data protection. These include the African Charter on Human and Peoples Rights (ACHPR)¹⁴⁶⁰, the International Convention on Civil and Political Rights (ICCPR)¹⁴⁶¹, the Windhoek Declaration for the Development of a Free, Independent and Pluralistic Press¹⁴⁶², the African Platform on Access to Information Declaration (APAI)¹⁴⁶³ and the African Union Convention on Cybersecurity and Personal Data Protection (Malabo Convention)¹⁴⁶⁴, amongst others. Empowered by the Independent Broadcasting Authority (IBA) Act 2010, the Independent Broadcasting Authority is the regulator for the country's radio and television services.¹⁴⁶⁵

In relation to online freedoms, for 2024, Zambia ranked "partly free", with a score of 62, on the Freedom on the Net 2024 scorecard. This is a slight decline from the country's score of 59 in 2023.¹⁴⁶⁶ The country has not experienced an internet shutdown since an August 2021 partial internet shutdown which lasted 48 hours. During this time, social media platforms such as WhatsApp, Facebook, Messenger and Twitter were inaccessible. This coincided with the presidential elections which saw the change in power from the then ruling party Patriotic Front (PF), headed by Edgar

1451 ZICTA '2023 mid-year market report' (2023) https://www.zicta.zm/market-reports/2023_mid_year_market_report.pdf (accessed on 5 November 2024)

1452 Living Cost 'Cost of Living in Zambia' (2024) <https://livingcost.org/cost/zambia> (accessed on 9 January 2024).

1453 Average Salary Survey 'Average Salary in Zambia' <https://www.averagesalarysurvey.com/zambia> (accessed on 9 January 2024)

1454 Cable.co.uk 'Worldwide Mobile Data Pricing 2022' (2023) <https://www.cable.co.uk/mobiles/worldwide-data-pricing/> (accessed on 12 January 2024)

1455 Constitution of Zambia Act 18 of 2016.

1456 Constitution of Zambia Act 18 of 2016 art 20 n13 above.

1457 n 13 above above, art 29.

1458 n 13 art 21.

1459 n 13, art 17.

1460 African Commission on Human and People's Rights (ACHPR) Declaration on Freedom of Expression and Access to Information, <https://www.achpr.org/legalinstruments/detail?id=69> (accessed 9 November 2024).

1461 Universal Declaration of Human Rights (UDHR), <https://www.un.org/en/aboutus/universal-declaration-of-human-rights> (accessed 9 November 2024).

1462 Windhoek Declaration.

1463 African Platform on Access to Information <https://www.africanplatform.org/> (accessed 9 November 2024).

1464 African Union Convention on Cyber Security and Personal Data Protection <https://au.int/en/treaties/african-union-convention-cyber-security-and-personal-data-protection> (accessed 12 December 2023).

1465 Independent Broadcasting Authority Act (amended in 2010)

1466 Zambia, Freedom House available at <https://freedomhouse.org/country/zambia/freedom-net/2024> (accessed on 19 October 2024)

Lungu, to Hakainde Hichilema's United Party for National Development.¹⁴⁶⁷

Concerningly, incidences of arrests of opposition leaders have been heightened during the period under review. In August 2024 the Zambia Police Service arrested PF Secretary General Raphael Nakacinda on sedition charges, where he is accused of violation of section 57 (1)(b) and section 60 (1)(b) of the Penal Code Act, Chapter 87 of the Laws of Zambia.¹⁴⁶⁸ Media outlet News Diggers reported that the arrest followed comments made by Nakacinda encouraging Edgar Lungu supporters to go to the former president's residence where, he alleged, law enforcement agencies were conducting a raid, ordered by President Hakainde Hichilema.¹⁴⁶⁹

In the same month, Dr. Fred M'membe, the leader of the Socialist Party, was also arrested and charged with seditious practices after he published an article on his X (formerly Twitter) and Facebook accounts titled, "Tshisekedi tells DRC Catholic Bishops about the USD 20 Million Payout to buy Zambia's silence." According to MISA Zambia, Rae Hamonga, the Zambia police Public Relations Officer alleged that this article intended to "bring into hatred or contempt or to incite disaffection against the government as established by law."¹⁴⁷⁰

Other actors who have faced sedition as well as espionage charges in the period under review include Edith Nawakwi, the opposition Forum for Democracy and Development leader, civil rights activist, Brebner Changala, and Members of Parliament, Munir Zulu and Maureen Mubongo.¹⁴⁷¹ In November 2024, Zambia's Catholic Bishops released a statement expressing their concern at the number of arrests of opposition leaders. The statement made the distinction between arrests on corruption charges and those of a "political nature that fall within the realm of the exercise of democratic rights."¹⁴⁷²

In October 2024, the Zambia Police Service arrested investigative journalist and chief consultant of the Zambian Whistleblower Thomas Allan Zgambo. Although the reasons were not disclosed, The Mast Newspaper reported that a police officer who spoke on condition of anonymity disclosed that Zgambo has been arrested on allegations of criminal libel.¹⁴⁷³ In response, the Committee to Protect Journalists (CPJ) released a statement condemning Zambian authorities for Zgambo's detention without charge and called for his immediate and unconditional release. CPJ noted that this was the third time Zgambo had been arrested, with prior arrests in November 2023 on a charge of seditious practices relating to an article he wrote criticizing the government over food imports, and in August 2023, again on a sedition charge for him calling on the government to reveal any links between a property it leased and Zambian president Hakainde Hichilema. CPJ also noted that Zgambo's latest arrest was on the same day that Hichilema committed to upholding press freedom.¹⁴⁷⁴

These incidences have also caused concern globally, with United Nations (UN) experts, in August 2024, condemning allegations of arbitrary arrests and detentions on charges of unlawful assembly, espionage, hate speech and seditious practices against opposition political party leaders and members, parliamentarians, human rights defenders and activists, as well as restrictions on

1467 The Verge 'WhatsApp, Twitter, and Facebook are reportedly blocked in Zambia during its presidential election' (2021) <https://www.theverge.com/2021/8/12/22621875/whatsapp-twitter-facebook-blocked-zambia-presidential-election> (accessed on 22 November 2024)

1468 Zambia Monitor 'Party chief, Nakacinda, arrested for alleged seditious practices' (2024) https://www.zambiamonitor.com/party-chief-nakacinda-arrested-for-alleged-seditious-practices/#google_vignette (accessed on 19 November 2024).

1469 News Diggers 'Police Nap Nakacinda For Sedition' (2024) <https://diggers.news/local/2024/10/03/police-nab-nakacinda-for-sedition/> (accessed on 19 November 2024).

1470 MISA Zambia 'Socialist President Fred M'membe arrested for seditious practices' (2024). <https://register.misa.org/2024/08/12/socialist-party-president-fred-mmembe-arrested-for-seditious-practices/#:~:text=On%20August%20%2C%202024%2C%20the%20Zambia%20Police%20Service,aged%2065%2C%20for%20the%20offence%20of%20seditious%20practices> (accessed on 19 November 2024).

1471 Zambian Monitor 'Nawakwi, Changala, Zulu, Mubungo risk 25 years jail term as state slams espionage charges on them' (2024) <https://www.zambiamonitor.com/nawakwi-changala-zulu-mubungo-risk-25-years-jail-term-as-state-slams-espionage-charges-on-them/> (accessed on 20 November 2024)

1472 The International Catholic News Weekly, "Zambian bishops condemn threats to 'democratic rights', (2024), <https://www.thetablet.co.uk/news/zambian-bishops-condemn-threats-to-democratic-rights/> (accessed on 22 November 2024)

1473 The Mast, "Police Arrest Journalist Thomas Zgambo", (2024), https://www.facebook.com/story.php?story_fbid=848840817448532&id=100069678643839&rid=trBK2sQNplXsBHy7 , (accessed on 20 November 2024)

1474 ZANIS TV 'Promise of a new dawn for press freedom here to stay – HH' (2022) <https://www.facebook.com/watch/?mibextid=W-C7FNe&v=858448373122944&rid=98tZCivdsrskU5E> (accessed on 13 November 2024)

gatherings, meetings, peaceful protests and rallies in Zambia.¹⁴⁷⁵ The UN experts noted 26 reports of such cases since January 2022 further noting that in some cases individuals faced reprisals for expressing diverging, and critical views whilst in others, the cases were intended to “curtail participation in political and public life”.¹⁴⁷⁶ Concern has been raised by Zambia’s Conference of Catholic Bishops noting their “alarm” at the rise in the number of arrests as well as the length of detention of opposition leaders.¹⁴⁷⁷

Recent developments in the country have raised questions about the ruling party’s commitment to upholding the principles of freedom of speech and expression, particularly as they relate to citizens’ use of digital tools and social media platforms to express their opinions about socio-economic issues in the country. In October 2024, the UPND party’s Deputy Media Director, Cheelo Katambo, strongly criticised ZICTA for what he termed “the continued embarrassment of our president as if we are a nation without laws and institutions”, which were taking place online.¹⁴⁷⁸ In the same month, ZICTA’s Director General Choolwe Nalubamba resigned from his role, with no reason provided for this.¹⁴⁷⁹

According to data from Meta, the social media platform received legal requests from the government of Zambia, one was an emergency disclosure request, and five user/account requests from the government between July and December 2023. The social media platform did not comply with any of these requests.

Zambia has long been a signatory of the African Platform on Access to Information.¹⁴⁸⁰ In December 2023, President Hakainde Hichilema enacted the historical Access to Information law which was pending for over 20 years, and a source of great controversy. The Act is intended to eliminate bottlenecks associated with accessing vital state and public interest information, build trust between government and citizens and in turn promote accountability, transparency and human rights in the country. However, some civil society and human rights organisations have indicated that while the current law meets acceptable international standards it still needs more work. For example, although the majority of government Ministries endeavour to provide critical information such as budget speeches and ministerial declarations they call for more proactive and detailed disclosure of information by the government. One example is through the placing of responsibility of monitoring compliance with the Act on the government through the Information Ministry instead of an oversight body like the Human Rights Commission as prescribed by the African Union Model Law on Access to Information for Africa.¹⁴⁸¹

Data Protection and Privacy

In regards to data protection, the government enacted the Data Protection Act in 2021, and established a Data Protection Office with Mr Likando Lyuwa appointed as the Commissioner.¹⁴⁸² However, adequate cyber regulation has been slower to materialise. In August Zambia’s Cabinet repealed the Cyber Security and Cyber Crimes Act No. 2 of 2021, and instead divided it into two separate bills: the Cyber Security Bill, 2024, and the Cyber Crimes Bill, 2024. The government noted the primary goals of the Cyber Security Bill, 2024, including the establishment of the Zambia Cyber Security Agency and the safeguarding of critical information and its infrastructure, among other objectives.

In contrast, the Cyber Crimes Bill, 2024, aims to criminalise unlawful activities associated

¹⁴⁷⁵ United Nations Human Rights Office of the High Commissioner, ‘Zambia must immediately halt downward spiral of infringements on fundamental freedoms: UN experts’ (2024) <https://www.ohchr.org/en/press-releases/2024/08/zambia-must-immediately-halt-downward-spiral-in-fringements-fundamental> (accessed on 14 November 2024)

¹⁴⁷⁶ As above

¹⁴⁷⁷ Voice of America ‘Zambia’s Catholic Bishops Raise Concern Over Rights Violations’ (2024) Zambia’s Catholic Bishops Raise Concern Over Rights Violations - allAfrica.com (accessed on 25 November 2024)

¹⁴⁷⁸ CAJ News Africa, ‘Heads roll at Zambia telecoms regulator’ (2024) <https://www.cajnewsafrica.com/2024/10/15/heads-roll-at-zambia-telecoms-regulator/> (accessed on 25 November 2024)

¹⁴⁷⁹ News Diggers ‘ZICTA DG resigns’ (2024) <https://diggers.news/local/2024/10/11/zicta-dg-resigns/> (accessed on 10 November 2024)

¹⁴⁸⁰ African Platform on Access to Information available at <https://www.africanplatform.org/> (accessed 20 November 2024).

¹⁴⁸¹ News Diggers ‘Access to Information A Pandora’s Box’ (2023) <https://diggers.news/guest-diggers/2023/12/19/access-to-information-bill-a-pandoras-box/> (accessed 20 November 2024).

¹⁴⁸² Zambia National Broadcasting Corporation (ZNBC) ‘Office of the data protection Commissioner coming’ (2023) <https://www.znbc.co.zm/news/office-of-the-data-protection-commissioner-coming/> (accessed 15 November 2023).

with computer systems and information communication technologies, while also ensuring the protection of individuals from cyber crimes and enhancing online safety for children.¹⁴⁸³ In November 2024, the government of Zambia attempted to pass the two bills through Parliament, leading to outcry from stakeholders including the public and civil society. A coalition of over 15 civil society organisations (including PIN) quickly mobilised against the planned passage of the bills. The coalition noted concerns that elements of the bills gave the president and the government inordinate and undemocratic power over citizens utilisation of the internet; unjustified and barely fettered access to the private communication of citizens, political parties and all entities that use the internet in the country; extensive surveillance powers of citizens, citizen groups and enterprises without clear accountability or justification; vaguely defined crimes that carry highly punitive consequences; and power to suppress freedom of expression and dissent. On December 5, the government of Zambia deferred the reading of the bills in Parliament, citing the need for further consultation.¹⁴⁸⁴

The development of a rights-respecting, robust cybercrime regulatory environment comes as cybercrime poses a rapidly growing threat to Zambia's security, economy, and population. ZICTA's 2022 National Cyber Risk Assessment Report revealed that the highest level of sector vulnerabilities are in the government, healthcare and water and sanitation institutions. On the other hand, financial and banking institutions have a potential worst-case impact of up to 3% of the country's GDP.¹⁴⁸⁵ In November 2024, Milner Makuni, the government's Director of Communication and Digital Technologies, divulged that Zambia registered 100,000 cybercrime cases, primarily on social media platforms, in 2022, according to the last available data.¹⁴⁸⁶

In April 2024, combined efforts from the Drug Enforcement Agency police, the immigration department and the anti-terrorism unit led to the arrest of 77 people on cyber crimes-related charges. The authorities confiscated over 13,000 local and foreign mobile phone SIM cards, two firearms and 78 rounds of ammunition during the raid. While the majority of those arrested were Zambian, in June 2024 22 Chinese nationals from the syndicate and one Cameroonian national were among those sentenced to terms ranging from 7 to 11 years and fined between \$1500 and \$3000 after pleading guilty to charges of computer-related misrepresentation, identity fraud and illegally operating a network or service.¹⁴⁸⁷

In February 2024 the Zambia Police Service announced the arrests and charges against four suspects, Alick Sakala, Chimango Luhanga, Samuel Mweene, and Albert Chikumbi, for a range of cybercrime offences including identity theft, hate speech, and the use of Insulting language.¹⁴⁸⁸

AI and Emerging Technologies

In November 2024 the government of Zambia launched its artificial intelligence (AI) strategy, which was developed in conjunction with Zambian experts and supported by the government of Finland and the Tony Blair Institute for Global Change.¹⁴⁸⁹ Through this launch, the country joins a small group of African countries, identified by Musoni, which have a dedicated AI strategy, including Rwanda, Benin, Egypt, Morocco, Mauritius, Tunisia, Sierra Leone, and Senegal.¹⁴⁹⁰ The AI strategy comprises five focus areas: (i) Digital Trees to enhance connectivity, (ii) Reliable Data for efficiency and sustainability, (iii) Trust and Confidence to safeguard cyberspace, (iv) fostering innovation and

1483 Zambian Monitor, "Zambia's cabinet endorses new cyber security, cyber crimes legislation", (2024), https://www.zambiamonitor.com/zambias-cabinet-endorses-new-cyber-security-cyber-crimes-legislation/#google_vignette, (accessed on 20 November 2024)

1484 News Diggers 'Govt Defers Cyber Security and Cyber Crime Bills' 2024 <https://diggers.news/local/2024/12/06/laz-media-owners-other-csos-reject-enactment-of-cyber-laws/> (accessed on 13 January 2024)

1485 Zambia Information and Communication Technology Authority (ZICTA) 'National Cyber Risk Assessment Report (2022) .

1486 ITweb Africa 'ITU, Zambia form cyber security alliance' (2024), <https://itweb.africa/content/o1Jr5qxPGgeqKdWL> (accessed on 21 November 2024)

1487 AP '22 Chinese nationals sentenced to long prison terms in Zambia for multinational cybercrimes' (2024), <https://apnews.com/article/zambia-chinese-nationals-jailed-cybercrimes-f0e1dec5c4a08a23c270c469f70f8557> (accessed on 20 November 2024)

1488 Zambian Day 'Police Bust Cyber Criminals' (2024), <https://www.facebook.com/zambianday/posts/police-bust-cyber-criminals-police-statement-four-suspects-officially-charged-an/1196494231565261/> (accessed on 21 November 2024)

1489 Government of Zambia, 'Artificial Intelligence strategy launched, a stepping stone to wealth and job creation' <https://www.mots.gov.zm/?p=4492>

1490 M Musoni, "Envisioning Africa's AI governance landscape in 2024" (2024) <https://ecdpm.org/work/envisioning-africas-ai-governance-landscape-2024#:~:text=Currently%2C%20less%20than%2010%20African%20countries%20have%20national,Egypt%2C%20Morocco%2C%20Mauritius%2C%20Tunisia%2C%20Sierra%20Leone%2C%20and%20Senegal.> (accessed on 4 November 2024)

entrepreneurship, and (v) creating partnerships.¹⁴⁹¹

The adoption of a dedicated AI strategy is well timed as the government is already adopting the use of artificial intelligence technologies. For example, in April 2024, the Minister of Finance announced that the government is operationalising the country's national Ground Receiving Station satellite data which can be used to enable the use of artificial intelligence in the areas of precision agriculture, mineral exploration, and natural resource management.¹⁴⁹²

Digital Inclusion

The August 2024 launch of Zed Mobile, the country's fourth mobile network operator, though positive for consumer choice, is unlikely to move the needle significantly in terms of improving access to mobile and internet services unless the investment focuses outside of the country's urban centres which are already saturated with network accessibility. The operator's technical strategy is focused on rolling out 4G coverage for data and voice as well as a 5G deployment. However, at present its services are only available in parts of the capital city Lusaka.¹⁴⁹³

In the Minister of Finance, Situmbeko Musokotwane's Budget Speech for 2025, presented in October 2024, he noted that the launch of Starlink in the country, which took place in March 2023 is supporting the connectivity of unserved and underserved areas. In a bid to improve public service delivery, the government has also procured 525 Starlink kits, with 288 of these to be installed in 109 post offices, 23 youth resource centres, and the country's 156 constituency offices by end-2024. The minister also committed that the kits would be installed in areas including agriculture camps, selected local authorities, and border facilities, by end-2024.¹⁴⁹⁴ This is part of the government's plan to establish Digital Transformation Centres. These centres aim to provide Internet access, as well as training programs for digital literacy and skills such as digital entrepreneurship and innovation.¹⁴⁹⁵ The government established 48 Digital Transformation Centres out of which 23 are located in youth resource centres and 25 in rural post offices. By December 2024, it also set the goal of repurposing 75 Post Offices into Digital Transformation Centres with full internet connectivity by the end of the year. In 2025, an additional 50 post offices will be repurposed into Digital Transformation Centres.¹⁴⁹⁶

The government also announced that it will construct 202 new towers by the end of 2024 as an investment in the country's communication and technology infrastructure. The private sector has pledged to construct 31 of these, while the government will construct 171 of the towers through ZICTA, at a cost of ZMW409 million.¹⁴⁹⁷

Electricity challenges which have plagued the country for the better part of 2024 have also had a negative impact on bridging the digital divide. The government attributed this to record low water levels in the country which is highly reliant on hydroelectric power.¹⁴⁹⁸ Mobile network operators have lamented the high costs of rolling out network infrastructure as well as maintaining services owing to the marked decline in electricity access with blackouts lasting up to 16 hours per day. As such, consumers have also borne the brunt and struggled to remain connected to communications services in the country.

However, in an upside for connectivity in the country, the Zambian government has focused

1491 Zambia Monitor 'Zambia launches artificial intelligence strategy to boost digital economy' (2024) https://www.zambiamonitor.com/zambia-launches-artificial-intelligence-strategy-to-boost-digital-economy/#google_vignette (accessed on 22 November 2024)

1492 Government of Zambia '2025 Budget Speech' (2024) https://www.parliament.gov.zm/sites/default/files/images/publication_docs/2025%20BUDGET%20SPEECH%20%20FINAL.pdf (accessed on 29 October 2024)

1493 Zed Mobile, <https://zedmobile.co.zm/about/> (accessed on 19 November 2024)

1494 Government of Zambia, '2025 Budget Speech' (2024) https://www.parliament.gov.zm/sites/default/files/images/publication_docs/2025%20BUDGET%20SPEECH%20%20FINAL.pdf (accessed on 29 October 2024).

1495 The Punch, Zambia to build nationwide digital hubs for free internet (2024) <https://www.msn.com/en-xl/africa/other/zambia-to-build-nationwide-digital-hubs-for-free-internet/ar-AA1IKItU?ocid=BingNewsVerp> (accessed on 21 November 2024).

1496 Government of Zambia, '2025 Budget Speech' (2024) https://www.parliament.gov.zm/sites/default/files/images/publication_docs/2025%20BUDGET%20SPEECH%20%20FINAL.pdf (accessed on 29 October 2024).

1497 As above.

1498 International Growth Center 'Lights out: Zambia's electricity crisis' (2024) <https://www.theigc.org/blogs/lights-out-zambias-electricity-crisis#:~:text=Low%20water-levels%20at%20the%20main%20reservoirs%20for%20hydroelectric,businesses%20unprepared%20and%20without%20back-up%20sources%20of%20energy.> (accessed on 16 January 2024)

strongly on driving up investments into the country's ICT infrastructure. In July 2024, the World Bank pledged US\$100 million to invest in Zambia's digital infrastructure to increase access to the internet and digital services for the population.¹⁴⁹⁹ In November 2024 the global connectivity provider Angola Cables also announced that it plans to enter into the Zambian market to provide internet connectivity.¹⁵⁰⁰ In June, Google, through its subsidiary, Google Cloud, and the Ministry of Technology and Science, signed a Memorandum of Understanding for the creation of a Centre of Excellence in digital transformation and innovation to promote skills development and knowledge sharing.¹⁵⁰¹ In October 2024 the governments of Zambia and Burundi signed a memorandum of understanding to connect the two countries via an underwater fibre optic cable submerged in Lake Tanganyika. This would make it the ninth country to be connected to Zambia by cable, behind Angola, Botswana, the Democratic Republic of Congo, Malawi, Mozambique, Namibia, Tanzania and Zimbabwe.¹⁵⁰²

Digital IDs

By the end of 2023, over 1 million Zambians had registered for digital identity cards.¹⁵⁰³ This follows the introduction of the Integrated National Registration Information System (INRIS) project in 2022, a digital biometric national identity management system that will replace the traditional paper and manual national registration system. The Presidential Delivery Unit pledged a goal of registering 100% of the population over 16-years-old for digital ID cards within six months of rollout.¹⁵⁰⁴ While no further information, regarding adoption, was available in this regard, in January 2025, the SMART Zambia Division issued a general procurement notice for digital ID and trust services under the Digital Zambia Acceleration Project. As part of the project, the government aims to develop a digital ID and trust services framework to create a "secure and reliable" platform for the identification of citizens to enable their access to public and private sector services. The project has a total value of \$100 million, and the government divulged that it had received \$6 million from the World Bank as a project advance for the procurement of goods, works, and services under the project.¹⁵⁰⁵

Review of Universal Access and Service Fund

ZICTA is responsible for administering the country's Universal Access and Service Fund (UASF) which is established under the ICT (Universal Access) Regulations Act 2012.[47] The regulator has been consistent in the collection of the UASF, which stands at 1.5% of operator revenues, and the governance and administration of the Fund have improved over the years through institutional reforms and clear implementation plans. While the Fund alone may not be sufficient to meet the country's ICT deficits, the overall impact can be seen.

The regulator's annual report for 2023, which is the latest available annual issue, notes that in 2023 the Universal Access Service Fund (UASF) utilised the fund for activities such as the provision of 845 computers, 25 printers, five smartboards, and 21 projectors to 25 institutions nationwide.

In collaboration with Fibrecom, the regulator began a project to connect 15 tertiary institutions to the internet. The project was part of the regulator's aim to provide low-cost broadband services

1499 Developing Telecoms 'World Bank pledges US\$100m for Zambia digital acceleration project' <https://developingtelecoms.com/telecom-business/telecom-investment-mergers/17043-world-bank-pledges-us-100m-for-zambia-digital-acceleration-project.html> (accessed on 19 November 2024).

1500 Developing Telecoms 'Angola Cables looks to expand into Malawi, Zambia, and Zimbabwe' (2024), <https://developingtelecoms.com/telecom-technology/optical-fixed-networks/17625-angola-cables-looks-to-expand-into-malawi-zambia-and-zimbabwe.html> (accessed on November 21 2024).

1501 ITWeb Africa 'Google to open AI centre of excellence in Zambia' (2024) <https://itweb.africa/content/nWJad7bNdrQ7bjO1> (accessed on November 23 2024)

1502 Developing Telecoms 'Burundi and Zambia plan cable connection' (2024) <https://developingtelecoms.com/telecom-technology/optical-fixed-networks/17421-burundi-and-zambia-plan-cable-connection.html> (accessed on November 21 2024).

1503 African Wireless Communications 'Zambia's first million digital ID cards registered' (2023) <https://www.africanwirelesscomms.com/news-details?itemid=7069>

1504 IT Web Africa: Zambia 'Zambia transitions to a digital IDs' (2023) <https://itweb.africa/content/P3gQ2qGAWYN7nRD1/ap6Gx-RKqYaqb3Wjr> (accessed 15 December 2023).

1505 Biometric Update 'Zambia issues general procurement notice for digital ID, trust services project' (2025) <https://www.biometricupdate.com/202501/zambia-issues-general-procurement-notice-for-digital-id-trust-services-project>

to education institutions in the country. It aimed for completion in 2024, connecting 63 learning institutions to the Government Wide Area Network (GWAN), with the project set for completion in 2024. In the same period, the UASF also enabled the provision of customised ICT equipment to institutions, specifically for use by persons with disabilities; introduction of connectivity and provision of ICT equipment (60 laptops, 15 tablets, 17 printers, and one projector) to the Kalulushi General Hospital and New Gwembe District Hospital, as well as the development of an e-learning platform. The grade 10 and 11 syllabi were validated by end-2023; and the initiation of the construction of 31 communication towers, under the Communication Towers Program. As at the end of 2023, 213 towers had been constructed under the program.

In its mid-year market report for 2024, the regulator announced that under its Universal Access and Service Fund it had begun the construction of 51 telecommunication towers and the relocation of 40 towers in the first half of 2024.¹⁵⁰⁶

Zambia Score Index

11

DIGITAL
RIGHTS
AND
INCLUSION
IN AFRICA
REPORT

LONDA
2024

Londa 2025 Key Indicators	ACHPR Declaration (P stands for Principle)	Score	Justification
1. Internet Shutdowns	P38(2)	5	Internet shutdowns have generally not been the norm in Zambia's technology journey. There have been no internet shutdowns in 2024. The last one was in 2021, and was generally seen as an outlier, during the country's last presidential elections which saw a change of government.
2. Laws, policies and other measures to promote universal, equitable, affordable and meaningful access to the internet	P37	4	The Universal Access and Service Fund law exists and is a mandate of the regulator ZICTA with targets every year. The challenge here is really around the transparency regarding the total funds allocated and spent each year, how well the targets are being met, as well as regular and traceable reporting. Greater disclosure and transparency required around efficient and adequate use of UASF is needed.
3. False News Criminalisation	P22(2)	3	Increasing incidences reported of arrests and charging of ordinary citizens based on posts they make on social media deemed to be false news.
4. Sedition Legislation	P22(2)	2	Increasing reliance on sedition charges, particularly targeting opposition leaders.
5. Arbitrary Arrests and Harassments of the Media, HRDs and Citizens	P20(1) & (2)	2	Increasing incidences reported mainly of arrests of journalists who report on the government and alleged corruption and governance issues.
6. Data Protection Legislation.	P42	4	Data protection legislation has been enacted. Implementation and enforcement has been very slow, also the independence of the data protection commissioner from the president's office is in question as they are appointed by the president's office. Also the Data Commissioners office is notoriously under resourced funds and personnel wise.
7. States interfere and require the removal of online content by internet intermediaries	P38 and P39(4)	4	This has not been reported in 2024.

8. Invasion of Privacy of Communications	P41	3	Not reported in 2024. The last notable instance was in 2023 when the regulator required live facial photographs for individuals requiring SIM cards. The matter was taken to court by Chapter One Foundation and Bloggers of Zambia. However the planned cybersecurity legislation is concerning because it includes a provision for ex parte applications for access to, confiscation, and surveillance of citizens' communications.
9. Failure by the government to proactively disclose and disseminate information on digital technologies.	P29(3)	4	Just before the year under review, the Access to Information Act was passed. The government is relatively proactive in this regard. Particularly through digital inclusion exercises and roadshows.
10. AI and Emerging Technologies national strategies	P39(6)	4	Launched after wide stakeholder engagement. This joins the National Digital Transformation Strategy running from 2023-2027.
11. Adoption of specific child laws, policies and measures promoting children's digital safety and privacy online	P37(5)	2	Inadequate online child safety laws. The proposed cyber bills include a focus on child protection, however, there are no standalone policies or laws in place.
12. Digital Inclusion	P37(3)	3	Progressive rise in mobile and internet usage in the country. Active investments in expanding access from the government through building of towers, increased investment in the state-owned operator as well as private sector players investments. However a combination of economic decline, power challenges have contributed to Quality of Service issues in 2024, with the regulator struggling to encourage compliance from operators.
TOTAL (up to 60)		40	

