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July 8, 2011

The Honorable Mary L Schapiro
Chairman
US Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Dear Chairman Schapiro,

World Vision* thanks you for accepting public comment on Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, file number S7-40-10.

We respectfully submit the following written comments concerning the proposed Securities and Exchange Commission's regulations and implementation of the Conflict Minerals Provision. The Provision mandates specific disclosures concerning conflict minerals that originate in the Democratic Republic of the Congo, or, an adjoining country.

World Vision is a Christian humanitarian organization that has worked in the Democratic Republic of Congo since 1984. For decades we have also served in its Great Lakes Region neighbors Rwanda, Burundi, Uganda and Tanzania. USAID, other governmental and international agencies, and private donors, have supported our work in the DRC with more than \$165 million of support. With this funding we have served more than 2.5 million people, including internally displaced people (IDPs), poor and vulnerable children, families, and entire communities. Our work has focused on emergency humanitarian protection, food and relief supplies to IDPs (in Eastern DRC), and improving education, health (especially on HIV/AIDS), food security, and water and sanitation.

* World Vision has been serving, and partnering with, vulnerable children and their communities around the world for almost 60 years. Today, we continue this mission in more than 100 countries worldwide, through the hard work of our 40,000 employees, most of whom are from the country in which they serve. More than 1 million Americans, from every state, supported our work last year with their donations. Because of the human cost of the conflict – especially for children – DRC is a top priority for the World Vision partnership, which includes 22 support offices in countries like Canada, the United Kingdom, and Australia.

Our staff on the ground, and our Congolese partners, witness daily how the illegal exploitation of natural resources contributes to instability in the eastern region and to immense suffering. Mortality rates are staggering. Mass displacement is large-scale. Sexual violence is rampant and often used as a weapon to terrorize and humiliate communities.

There is an urgent need to break the link between violent conflict in DRC and the illegal use of these minerals. A crucial step is to require transparency regarding the origin and supply chain of the minerals, like the type of disclosure required by Section 1502. World Vision played a key role in the creation of this law, working closely with Congressional offices and other non-governmental organizations.

We commend the Commission for its thoughtfully developed proposed rule and recommend the following to ensure that the Rule has its intended effect:

- **Require that disclosures under Section 1502 be filed with, not merely furnished to, the Commission.**
- **Speed up the process of implementation and avoid delays or a phased-in approach.**

We are gravely concerned about the likely consequences on the ground for Congolese civilians if there are delays or a slow, gradual approach. The illicit trade continues to fuel serious human rights violations, including child and forced labor, enslavement of women, sexual abuse, and various illegal taxes, in and around mining communities in the East. Efficient, effective implementation will help to address the linkages between mineral exploitation and funding for illegal armed actors in the region.

We have observed on-the-ground that uncertainty about the timing of implementing the law has already led some legitimate companies and buyers to stop buying minerals from Eastern DRC. With the ongoing and increased uncertainty, more companies may follow suit, which would negatively impact a wide range of people, from miners to buyers. This in turn impacts ordinary Congolese who depend on the mining industry to earn a living, support their families, and survive. An end to legal purchasing, which would harm already very low-income Congolese, was not the intent of the legislation.

- **Adopt a clear framework for steps that issuers must take (1) to satisfy the reasonable country of origin inquiry standard, and (2) to execute appropriate and effective due diligence on the source and chain of custody of conflict minerals.**

Clear guiding principles and standards ensure effectiveness. We urge the SEC to adopt the Organisation for Economic Co-operation and Development (OECD) guidelines on responsible supply chain management of conflict minerals. These guidelines are necessary for harmonizing all aspects of implementation with widely-endorsed, existing practices and policies.

World Vision agrees with the Commission that:

- **The regulations should not exempt any class of issuer.**
- **Issuers should be required to maintain reviewable business records for at least five years.**
- **Extraction (mining) should be considered as “manufacturing” when issuers extract, or contract, to extract conflict minerals.**
- **The regulations should proscribe a clear definition of “recycled” or “scrap” conflict minerals in order to prevent companies from circumventing disclosure.**

We look forward to working with you to ensure that the implementation of the Conflict Minerals Provision is successful and expeditious. We are available at any time to answer your questions. Thank you for your time and attention.

Sincerely,

Adam Taylor
Vice President for Advocacy, World Vision US