12 February 2018

Jay Clayton
Chairman
U.S. Securities and Exchange Commission (SEC)
100 F St. NE
Washington, DC 20549-1090

RE: Disclosure of Payments by Resource Extraction Issuers

Dear Chair Clayton:

I am writing on behalf of Aviva Investors to share our input on the inclusion of the Disclosure of Payments by Resource Extraction Issuers rule (implementing Section 13[q] of the Exchange Act of 1934) in the Securities and Exchange Commission's regulatory agenda for 2018. Aviva Investors is a diversified financial services company with more than $472 billion in assets under management, as of September 30, 2017, in a range of asset classes. My comments follow Aviva's three previous submissions to the SEC on the topic the Disclosure of Payments by Resource Extraction Issuers rule, which you may find attached[1].

First, I would like to commend the SEC on the thoroughness of the rulemaking for Exchange Act Section 13(q) it issued in June 2016 and the Commission's vigorous defense of these critical regulations. As the SEC engages in a new effort at issuing implementing rules for Section 13(q), I hope to remind the Commission of the universal support the underlying law enjoys from every investor that has submitted comment during the rulemaking processes dating back to 2011. I would also like to emphasize the importance of the public, project-level disclosures resulting from the implementation of Section 13(q) in making investment decisions and reinforcing the objectives and standard of the Extractives Industries Transparency Initiative (EITI), of which Aviva Investors is long-time supporter.

At Aviva Investors we believe the effective management of risks necessitates disciplined and rigorous securities analysis methods. Our approach requires the corporate disclosures necessary to identify and act on opportunities and risks in our investable universe. This is especially true of our portfolios with exposure to the extractives sectors, which have a history of volatility due to political and regulatory risk. The disclosures required by Section 13(q) help address the need of detailed information regarding the financial relationship between extractives companies and the governments where they operate. The disclosure resulting from implementation of Section 13(q) would not be useful if it provided on an anonymous basis or without clear association to the company and project to which payments may be attributed.

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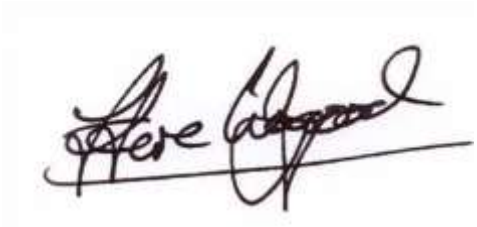
[1] https://www.sec.gov/comments/s7-25-15/s72515-52.pdf
https://www.sec.gov/comments/df-title-xv/resource-extraction-issuers/resourceextractionissuers-35.pdf
https://www.sec.gov/comments/df-title-xv/resource-extraction-issuers/resourceextractionissuers-36.pdf

In response to investor demand, complementary oil and mining payment disclosure laws in the European Union and Canadian have followed Section 13(q) and create a global standard for extractives payment transparency. Hundreds of oil and mining companies are making disclosures pursuant to the EU and Canadian laws that are providing material insights into investment decisions. We hope that in drafting a new rule for the implementation of Section 13(q) that the Commission makes definitions for project-level disclosure and other key considerations consistent with the EU and Canadian laws. Prioritizing consistency with the EU and Canadian laws would not only result in more useful disclosures to investors, but also fit the Congressional intent for the implementation of Section 13(q) and enhance the efficiency of compliance for reporting companies both in different jurisdictions and through the EITI processes in which they may be engaged.

As the attached previous comment letters emphasize, we believe strongly that the interests of investors should have consistent precedence over any other market actors if the Commission is to follow through on its mandate to maintain market efficiency, facilitate capital formation, and protect investors. We are grateful for the opportunity to share our perspective on the rule-making for Section 13(q) and would welcome the opportunity to engage further on this critical regulation.

Yours sincerely



Dr. Steve Waygood,
Chief Responsible Investment Officer
Aviva Investors