

The Honorable Mary Jo White
Chair
U.S. Securities and Exchange Commission
100 F Street N.E.
Washington, D.C. 20549-1090

Dear Chairwoman White:

As faith-based organizations and religious institutions, we share common values to care for God’s creation and to stand in solidarity with marginalized communities around the world. Many of us have partner organizations or staff and members on the ground in Africa, Asia, and Latin America. We have witnessed that many of the countries that suffer from the greatest rates of poverty and inequality are also those rich in natural resources such as precious gemstones, oil, gas and coal. This phenomenon has become known as the “resource curse” or the “paradox of plenty.”

A root cause of the resource curse is corruption, fostered by an extractives industry whose financial flows are shrouded in secrecy. Tragically, for too long, much of the revenue from natural resource exploitation has gone undistributed to local communities, flowing into the coffers of corrupt public officials and secretive companies instead. Some political leaders in resource rich countries have even used this money to inflict violence, including sexual assault and murder, on community members. Affected communities are routinely denied adequate information to fully understand the scope and impact of extractive projects, and are rarely offered a seat at the table when decisions are made regarding if and how those projects should proceed. This is why having access to detailed, project-level payment information, by company, is so vital for people living in resource rich communities.

We need renewed moral leadership from the United States to help combat corruption, protect human rights, and ensure that citizens can hold companies and their governments accountable for the money received from the project and how it is spent.

In July 2010, Congress responded to the “resource curse” paradox by passing Section 1504 of the Dodd-Frank Financial Reform and Consumer Protection Act, also known as the Cardin Lugar-Amendment. Section 1504 requires all oil, gas and mining companies that trade on the U.S. stock exchanges to disclose their payments to the host governments – both federal and foreign – at the project level.

By making these payments more transparent, communities can keep their governments and companies accountable. Doing so, however, requires payment disclosure at the granular project level. We were pleased with the original rules the Securities and Exchange Commission (SEC) released in 2012. While we were disappointed with the results of the lawsuit against the SEC, we are confident that with small clarifications, the SEC can once again issue a strong rule that protects marginalized communities and promotes the common good.

Four years is too long to go without implementation of Section 1504. Already, thanks to original leadership from the United States, Canada and the European Union have passed, or are in the process of passing, their own laws to ensure greater transparency in the natural resource sector. But the delay in

releasing a final rule for Section 1504 is causing the U.S. to fall behind and injustice to continue. **To ensure the implementation of Section 1504 without further delay, we urge you to release strong rules that will protect God's most marginalized communities no later than the end of 2014.**

Respectfully,

Africa Faith and Justice Network
American Jewish World Service
Church of the Brethren, Office of Public Witness
Church World Service
Columban Center for Advocacy and Outreach
Conference of Major Superiors of Men
Friends Committee on National Legislation
Global Ministries of the Christian Church (Disciples of Christ) and United Church of Christ
Maryknoll Office for Global Concerns
Medical Mission Sisters Alliance for Justice
Presbyterian Church (U.S.A.), Office of Public Witness
Sisters of Mercy of the Americas, Institute Justice Team
United Methodist Church, General Board of Church and Society
United Church of Christ, Justice and Witness Ministries

For questions regarding this letter, please contact: Chloe Schwabe, Maryknoll Office for Global Concerns, [REDACTED].