



Central Africa AG

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CRONIMET Central Africa AG – 6312 Steinhausen

The Honourable Mary L. Schapiro
Chairman
U.S. Securities and Exchange Commission
100 F Street NE
Washington, DC 20549
USA

By e-mail to: rule-comments@sec.gov

09 December 2010

Dear Chairman Schapiro,

COMMENTS RELATING TO DODD FRANK SECTION 1502 CONFLICT MINERAL LEGISLATION.

I am writing on behalf of CRONIMET Central Africa AG a company registered in Switzerland and its subsidiary Minerals Supply Africa Ltd, based in Kigali, Rwanda. We are one of the largest traders and processors of Cassiterite and Tantalite out of the DRC.

While we appreciate the laws intention to eradicate the fuelling of conflict from mineral sales, we have grave reservations as to the time frame for the implementation of the law. We were one of the founders of the iTSCi tracking and traceability programme in the area, set up by ITRI, the Tin association body and have also been involved from the beginning in the OECD due diligence guidance on purchasing conflict minerals.

The time frame for implementation of section 1502 of the conflict legislation has been exacerbated by the mining ban that was imposed by President Joseph Kabila since September 2010. The mining ban has meant that the iTSCi tagging scheme has been halted, which was one of the tools whereby companies could conform to the new legislation. The progress of the certification and tagging schemes cannot continue until such time as the ban is lifted, which we have heard may not be until the second quarter 2011.

With the time frame for implementation of the law as it exists at present, US publicly listed companies have issued a cut-off date of the end of March 2011 to buy un-tagged minerals from the region. If the ban is not lifted until this date, then there will be no tagged minerals to supply and this would in effect mean an end to mineral sales or an effective defacto embargo on minerals from Central Africa. The consequence of such an embargo would be catastrophic for the local artisanal miners who make their living and support their families from mining activities. Already there is civil unrest from the current Presidential mining suspension. If a defacto purchasing ban happens after the suspension is lifted, it will only increase civil unrest and hardship for the local populations.

I think many actors involved in Central Africa believe that disengagement is not the answer to stopping the conflict. By making the up-stream actors aware that mines controlled by military forces will not be tolerated and that only minerals bearing the iTSCi tags will be a tradable commodity on the open market is the best way to proceed. The ICGLR has adopted the iTSCi scheme, which has also been harmonised with the new OECD guidelines on responsible purchases from conflict affected areas. These measures strengthen stakeholder efforts in creating a self-supporting certification / traceability scheme for the prosperous and conflict free future for Central Africa. However to enable this to take effect, more time is needed to put the schemes into place.

We therefore ask the SEC to please consider extending the time frame for implementation of section 1502 of the Dodd Frank conflict mineral legislation, by at the very least a year. This would enable the actors on the ground to set up the schemes that will bring transparency and traceability to the Central African region.

We also support the points made by ITRI in their letter to you.

We hope that our above comments make clear the situation on the ground and show that it is imperative that extra time is given to create workable traceability in Central Africa.

If we can be of any help, please let us know.

Yours sincerely,

Candida Owens
Sales Manager – CRONIMET Central Africa AG.