



March 2, 2011

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

Re: Dodd-Frank Wall Street Reform Act - Section 1502 (Conflict Minerals)

Dear Chairman Schapiro:

The General Board of Pension and Health Benefits of The United Methodist Church (General Board) values the opportunity to comment on the rulemaking required to implement Section 1502 (Conflict Minerals) of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

The General Board is a faith-based institutional investor managing \$16 billion in assets on behalf of our 74,000 participants and various organizations affiliated with The United Methodist Church. As an agency of The United Methodist Church, we share the humanitarian concerns documented in the Act and commend Congress for demonstrating a willingness to address them. In addition to traditional financial analysis, we believe that consideration of environment, social and corporate governance (ESG) factors influences the long-term sustainability of the companies in which we invest. Thus, we support efforts to require the disclosure of standardized corporate ESG data, such as is called for in the Conflict Minerals section of the Act.

Companies that participate in the Electronic Industry Citizenship Coalition (www.eicc.info) have already begun developing mineral traceability programs. Whereas some have claimed that mineral traceability is impossible, others are working diligently to construct thoughtful solutions to a meaningful business risk related to their supply chains. Comprised almost entirely of companies in the electronics industry, these leading companies are seeking participation across a broad range of industries such as aerospace, industrial tools, medical devices, auto manufacturers and jewelry.

Along with other investors, we share the belief that sourcing of conflict minerals exposes companies and their shareholders to financial and reputational risks. Therefore, the additional disclosure required by Section 1502 will enable investors to evaluate how well a company is managing social, environmental and governance issues in its supply chain. At a minimum, companies should disclose the following in their Form 10-K:

- Whether they have a policy on conflict minerals and, if so, where it may be found;
- A detailed description of how they implement their policy, how far down the supply chain it is applied and how it is monitored/audited;



- What remediation procedures occur if they observe non-compliance with the policy;
and
- A report on the results of past remediation efforts.

Furthermore, if a company reports that it does not source minerals from the eastern Democratic Republic of Congo, it should describe how it came to that determination.

In 2009, the General Board wrote to the Commission in support of mandatory corporate disclosure of ESG factors. Such disclosure could also include Conflict Minerals and climate change (per the Commission's January 2010 memo, "Interpretive Guidance on Disclosure Related to Business or Legal Developments Regarding Climate Change"). Once again, we suggest that a comprehensive, standardized approach to ESG disclosure would be beneficial so shareholders can fully understand the risks of their investments.

Thank you for allowing us to comment on this matter. We welcome any additional questions that you may have about our organization or our support of this new legislation.

Sincerely,

David H. Zellner

Chief Investment Officer

Vidette Bullock Nixon

Director, Corporate Relations