

MEMORANDUM

To: File

From: John Fieldsend
Special Counsel
Office of Rulemaking
Division of Corporation Finance
U.S. Securities and Exchange Commission

Date: April 28, 2011

Re: Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act Regarding Congolese Conflict Minerals

On April 28, 2011, Felicia Kung, Steven Hearne, and John Fieldsend of the Division of Corporation Finance met with David E. Kunz and Raymond Bruker of Arkema Inc. The participants discussed the Commission's required rulemaking in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which relates to reporting requirements regarding conflict minerals originating in the Democratic Republic of the Congo and adjoining countries. At the meeting, a chart was provided to the staff by Arkema Inc., which is attached to this memorandum.

Attachment

World Production and Consumption Of Refined Tin

('000 tonnes)	2009					2010					2011f
	Q1	Q2	Q3	Q4	Year	Q1	Q2	Q3	Q4	Year	Year
Production											
China	24.0	37.3	38.0	41.3	140.6	35.0	39.4	40.1	40.5	155.0	156.0
Indonesia*	15.2	13.7	19.3	16.4	64.5	13.6	14.4	14.2	14.9	57.1	60.0
Malaysia	8.7	9.7	10.5	7.5	36.4	9.4	9.6	10.4	9.3	38.7	37.0
Thailand	4.0	6.2	5.0	4.0	19.3	5.0	5.6	6.3	6.6	23.5	22.0
Bolivia	3.6	3.5	3.9	4.0	15.0	3.8	3.7	3.7	3.7	14.9	16.0
Brazil	2.7	2.6	2.7	2.4	10.4	2.0	2.0	2.0	2.0	8.0	10.0
Peru	9.6	8.5	8.2	7.6	33.9	9.0	9.1	8.8	9.2	36.1	34.0
Belgium	2.0	2.2	2.3	2.2	8.7	2.4	2.6	2.5	2.4	9.9	12.0
Russia	0.2	0.3	0.3	0.2	1.0	0.3	0.2	0.2	0.3	1.0	1.0
Other	1.5	1.5	1.5	1.5	6.0	1.7	1.7	1.8	1.8	7.0	8.0
Total World	71.5	85.5	91.8	87.1	335.8	82.2	88.3	90.1	90.7	351.3	356.0
Consumption											
China	25.3	34.0	35.1	38.0	132.4	33.3	40.4	37.4	38.1	149.2	154.9
Japan	6.1	6.5	7.0	7.5	27.1	8.1	8.2	8.0	8.2	32.5	31.0
Other Asia	14.2	15.0	14.5	15.5	59.2	16.5	16.2	16.0	16.3	65.0	68.0
USA	7.3	7.1	6.0	6.0	26.4	7.5	7.5	7.5	7.5	30.0	30.0
Other Americas	4.1	4.1	4.2	4.2	16.6	4.5	4.5	5.0	5.0	19.0	19.0
Europe	13.5	14.0	14.0	14.3	55.8	15.0	15.5	17.3	16.0	63.8	63.0
Other	0.7	0.7	0.8	0.8	3.0	0.8	0.8	0.8	0.8	3.2	3.2
Total World	71.2	81.4	81.6	86.3	320.5	85.7	93.1	92.0	91.9	362.7	369.1

* Note: Indonesian production excludes metal re-refined in other countries

Data: production - CNI-A/Antaike, Malaysia Chamber of Mines, MSC, PT Timah, Thaisarco, Minsur, SNIEE, WBMS

consumption - USGS, WBMS, ITRI

Production Of Tin-In-Concentrates

('000 tonnes)	2009					2010e					2011f
	Q1	Q2	Q3	Q4	Year	Q1	Q2	Q3	Q4	Year	Year
China	16.3	20.2	15.0	21.0	72.5	20.4	19.5	18.2	25.5	83.6	
<i>Est unreported</i>	0.2	0.9	8.5	4.8	14.4	2.3	4.3	5.2	0.2	12.0	
Total China	16.5	21.1	23.5	25.8	86.9	0.0	0.0	0.0	0.0	95.6	96.6
Indonesia	6.6	7.9	17.1	12.3	43.9	8.9	11.7	11.1	10.0	41.7	0.0
<i>Est unreported</i>	12.0	15.0	14.0	10.0	51.0	11.0	14.0	14.0	12.0	51.0	0.0
Total Indonesia	18.6	22.9	31.1	22.3	94.9	19.9	25.7	25.1	22.0	92.7	95.0
Malaysia	0.6	0.6	0.6	0.6	2.4	0.8	0.9	0.9	0.9	3.5	4.0
Thailand	0.0	0.0	0.1	0.1	0.2	0.1	0.1	0.1	0.1	0.3	0.4
Bolivia	4.1	4.7	5.0	5.8	19.6	4.7	5.1	5.1	5.1	20.0	21.0
Brazil	3.0	2.6	2.6	2.3	10.4	2.3	2.2	2.3	2.7	9.5	11.5
Peru	9.0	9.5	9.7	9.3	37.5	9.2	9.2	8.2	7.3	33.8	33.0
Australia	1.5	1.4	1.5	1.5	5.9	1.8	1.7	1.7	1.3	6.5	7.5
Russia	0.2	0.2	0.2	0.2	0.6	0.2	0.2	0.2	0.2	0.6	0.7
DR Congo	3.4	3.4	3.4	3.4	13.6	3.5	3.5	4.0	2.0	13.0	11.0
Other Africa	0.8	0.7	0.7	0.8	3.0	0.8	0.9	1.0	1.0	3.7	4.0
Other countries	1.0	1.0	1.0	1.0	3.8	1.0	1.0	1.0	1.1	4.0	4.5
Total World	58.7	68.0	79.1	73.0	278.8	44.3	50.4	49.4	43.6	283.3	289.2

Data: CNI-A/Antaike, Malaysia Department of Mines, SNIEE, ABARE, WBMS, Company reports, CRU-ITRI estimates