MEMORANDUM

To: File

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

Date: November 2, 2011

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

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On November 2, 2011, Felicia Kung, Lillian Brown, Steven Hearne, and John Fieldsend of the Division of Corporation Finance participated in a telephone call with David Gornall, Stewart Murray, and Ruth Crowell of the London Bullion Market Association. The participants discussed the Commission's proposed rulemaking under 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. In an email prior to the call, the London Bullion Market Association provided the attached documents to the staff.

Attachments

Meeting of the SEC and the LBMA to be held via conference call at 10:00am EDT on 2nd November, 2011

Agenda

1. **LBMA involvement in Supply Chain regulation**
   (1) LBMA Good Delivery List work
   (2) LBMA Responsible Gold Guidance update attached

2. **Questions Raised at the SEC Roundtable**
   (1) Why the SEC should await the publication of the final OECD Gold Supplement.
   (2) Why legitimate recyclable material or "scrap" should not be disadvantaged by the rules.
   (3) Why existing stocks must be grandfathered.
   (4) Why gold must be treated differently from tin, tantalum and tungsten.

2nd November, 2011

LBMA

The London Bullion Market Association
Responsible Gold Guidance

About the London Bullion Market Association

The LBMA is the international trade association that represents the market for gold and silver bullion, which is centred in London but has a global client base, including the majority of the central banks that hold gold, private sector investors, mining companies, producers, refiners and fabricators. The current membership includes 129 companies which are actively involved in the loco London bullion market, including trading houses, banks, refiners, miners and fabricators as well as those providing services to the market such as consultants, supervisors and assayers. The membership encompasses a total of 22 countries. The LBMA was formally incorporated in 1987 at the behest of the Bank of England to take over the roles previously played by two separate organisations, the London Gold Market and London Silver Market, whose origins go back to the mid-nineteenth century.

The LBMA Good Delivery List

In the refining industry, the LBMA Good Delivery List includes the world's pre-eminent refiners of gold and silver, located in 31 countries. The List is widely recognized as the de facto standard for the quality of gold and silver market bars. This recognition is based on the stringent criteria that applicants must satisfy before being listed, as well as the regular proactive monitoring of accredited refiners by the LBMA. In addition to satisfying the LBMA's technical standards, a refiner seeking LBMA accreditation must meet a number of non-technical criteria in relation to ownership, tangible net worth and operating history. In response to the Dodd-Frank legislation on conflict minerals emanating from the DRC, the LBMA has informed all gold refiners on the List that in order to maintain their Good Delivery status, they will have to demonstrate that their refined output is conflict-free. To allow them to do this, the LBMA has developed a Responsible Gold Guidance Scheme.

LBMA Responsible Gold Guidance

The LBMA will require that, from 1st January 2012, all LBMA Good Delivery Gold Refiners comply with the LBMA Responsible Gold Guidance. Listed refiners have been sent a draft of the Guidance in September, 2011 and during the final quarter of the year they will be consulted before the final version is issued. The current draft can be obtained from the LBMA Executive or via the LBMA website (www.lbma.org.uk). The final version will also take account of the rules to be announced by the SEC as well as the OECD guidance on gold supply chains.

The LBMA Guidance is based on anti-money laundering principles as well as the five steps framework for risk-based due diligence of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas. The LBMA guidance is intended to provide a flexible framework for carrying out due diligence in this area and thus to minimise the cost of compliance for refiners, whilst ensuring that their feedstock and thus their output remains conflict-free.

OECD Due Diligence for Responsible Supply Chains – Gold Supplement

The LBMA supports the work of the OECD in the area of supply chain due diligence and has been actively involved in drafting the Gold Supplement section of the OECD Guidance. A number of members, both banks and refiners have contributed to this work and Ruth Crowell, the LBMA's Commercial Director, is the co-facilitator of the OECD Gold Guidance Drafting Committee and the LBMA's main contact for Responsible Gold.

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LBMA Responsible Gold Guidance

Introduction

LBMA has setup a Responsible Gold Guidance for good delivery refiners in order to combat serious abuses of human rights, to avoid contributing to conflict, to comply with high standards of anti-money laundering and combating terrorist financing practice.

This guidance follows the five steps framework for risk based due diligence of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas adopted on 15 December 2010.

Scope

All refiners producing LBMA good delivery gold bars ("Refiners") must comply with this LBMA Responsible Gold Guidance in order to remain on the LBMA Good Delivery List.

Definition

Existing Gold Stocks: Gold investment products (ingots, bars and coins) with a verifiable date prior to 1st January 2012, which will not require source/mine documentation.

Mined gold: Gold that originates from mines (large-scale, medium-scale or artisanal/small scales mines) and has never been previously refined This term means any gold or gold-bearing material produced by or at a mine, in any form, shape and concentration, until it is fully refined (995 or greater), fabricated into a gold refinery product (e.g., bar, grain), and sold.

Recycled Gold: Gold that has been previously refined. This term traditionally encompasses anything that is gold-bearing and has not come directly from a mine in its first gold life cycle. In practical terms, recyclable material includes end-user, post-consumer products, scrap and waste metals and materials arising during refining and product manufacturing, and investment gold and gold-bearing products. This category may also include fully-refined gold that has been fabricated into grain, good delivery bars, medallions and coins that have previously been sold by a refinery to a manufacturer, bank or consumer market, and that may thereafter need to be returned to a refinery to reclaim their financial value.

Human right abuse: Genocide, ethnic cleansing or widespread instances of (a) sexual abuse of men, women and children (b) torture, (c) enslavement, (d) trafficking of persons, (e) multiple unlawful killings or (f) the worst forms of child labour.

Contribution to conflict: Contribution to armed aggression between two or more parties which leads to human rights abuses. The parties in the conflict may include government, militia, organised criminals or terrorist groups

Money laundering: Money laundering is the practice of disguising the origins of illegally-obtained money. Ultimately, it is the process by which the proceeds of crime are made to appear legitimate. The money involved can be generated by any number of criminal acts, including drug dealing, corruption and other types of fraud. The methods by which money may be laundered are varied and can range in sophistication from simple to complex.

Terrorist financing: terrorist financing includes the financing of terrorist acts, and of terrorists and terrorist organizations.

AML-CFT: Anti-money laundering – combating the financing of terrorism.

Politically exposed person: Individual who is or has been entrusted with prominent public functions, for example Head of State or of government, senior politician, senior government, judicial or military official, senior executive of state owned corporations, important political party official, or individual who is closely related to such person.

Artisanal Mines: [•*This section will be added in Q4 2011*.]

Verifiable Date: A date which can be verified through inspection of physical date stamps on products as well inventory lists. Requirements applicable to Refiner's existing stocks with a subsequent date, or without a verifiable date, are the same as for other gold-bearing material; a refiner must provide the same level of source/mine documentation.

STEP 1 - Establish strong company management systems

1. Adopt a company policy regarding due diligence for supply chains of gold.

Refiners should adopt a gold supply chain policy which is consistent with the Model Policy set forth in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

The policy should cover at least the following topics:

- Scope
- Organization and responsibilities
- Criteria for high risk gold supply chain
- Supply chain due diligence, inclusive of the Know Your Customer process
- Monitoring of transactions
- Maintaining records
- Training

2. Set up an internal management structure to support supply chain due diligence

Refiners' internal management system should collect and maintain documentation regarding the sources of Mined Gold, Recycled Gold, Existing Gold Stocks or any other feedstock, in order to ensure that they have not financed conflict, have not participated in abuse of human rights or money laundering nor financed terrorism at any point in the supply chain. The general outline of a best practice for such a structure is as follows:

- Assign authority and responsibility to Senior Management with the necessary competence, knowledge and experience to oversee the supply chain due diligence process;
- Ensure availability of resources necessary to support the operation and monitoring of these processes;
- Put in place an organizational structure and communication processes that will ensure critical information, including the company policy, reaches relevant employees and suppliers
- Ensure internal accountability with respect to the implementation of the supply chain due diligence process

3. Establish a strong internal system of due diligence, controls and transparency over gold supply chains, including traceability and identification of other supply chain actors

Supply chain traceability system

Refiners should introduce a supply chain traceability system that collects and maintains supply chain information for each lot refined.

Maintaining records

Refiners should maintain adequate records of the supply chain documentation, as requested on step 2, section 2(assess risks in light of the standards of their supply chain due diligence system) in order to demonstrate that appropriate and ongoing due diligence has been followed. These records are required to be maintained for at least 5 years following the end of the Refiner's fiscal year. .

Training

Refiners should develop an ongoing gold supply chain training program for all staff involved in the gold supply chain.

Gold Supply Chain Officer

Refiners should nominate a Compliance Officer who reports to Senior Management.

The Compliance Officer is responsible for all matters regarding the gold supply chain. In particular, he reviews the gold supply chain due diligence and assesses if the due diligence is adequate and requests additional documentation or information if necessary. He ensures that appropriate measures are executed in case of high risk supply chains or transactions. He is also responsible for the training of the employees with respect to the responsible supply chain, to prepare and update the gold supply chain policy and to give proper information to the Senior Management in order for them to perform their duties.

4. **Strengthen company engagement with suppliers, and where possible, assist suppliers in building due diligence capacities**

Refiners should ensure that their gold suppliers commit to, and acknowledge in writing the compliance with, a supply chain policy consistent with Annex II of the OECD Due Diligence Guidance Model Policy for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

5. **Establish a company-wide communication mechanism to promote broad employee participation and risk identification to management**

Refiners should develop a mechanism allowing any employee to voice concerns over the gold supply chain or any newly identified risk.

STEP 2 - Identify and assess risk in the supply chain

1. **Identify risks in the gold supply chain**

For both Mined Gold and Recycled Gold, Refiners should identify in accordance with Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the following risks associated with the supply chain from the point of origin to the Refinery regarding:

- Serious abuses associated with the extraction, transport or trade of gold
- Direct or indirect support to non-state armed groups
- Public or private security forces
- Bribery and fraudulent misrepresentation of the origin of gold
- Money laundering
- Payment of taxes, fees and royalties due to governments.
- Money laundering risk and terrorist financing risk
- Contribution to conflict risk
- Human right abuse risk

2. Assess risks in light of the standards of their supply chain due diligence system

Supply chain due diligence

In order to map the supply chain and assess the risks effectively, Refiners should perform supply chain due diligence following a risk based approach before entering into business relationship with any gold supplier.

For Mined Gold, the supply chain due diligence should be done on each Company involved in the chain from the mine to the Refinery, including gold traders, exporters and transporters.

For Recycled Gold the supply chain due diligence should be performed for the Company from whom the Recycled Gold is purchased and from the transporters.

The supply chain due diligence measures should comprise the following:

- Identifying each company of the chain and verifying their identity using reliable, independent source documents, data or information;
- Identifying the beneficial owner of each company in the chain;
- Checking that each company in the chain and their beneficial owners are not named on any government lists for wanted money launderers, known fraudsters or terrorists;
- Obtaining business and financial details with regard to the company and information on the purpose and intended nature of the business relationship;
- For Mined Gold:
    - Identifying the origin of the gold and verifying such origin with reliable documents, data or information;
    - Obtaining mining license, if applicable;
    - Obtaining import/export gold license, if applicable;
    - Collecting and assessing mining practice;
    - Obtaining data on mining capacity;
- For Recycled Gold, collecting and assessing the Recycled Gold supplier's AML-CFT policy and practices,
- On-site investigation/visit for high risk supply chain aimed at substantiating the documentary supply chain due diligence findings;
- Conducting ongoing due diligence on the gold supply chain.

Refiners should apply each of the supply chain due diligence measures described above but may determine the extent of such measures on a risk sensitivity basis depending on the type of company, business relationship, transaction type, location of the company or transit zone. For higher risk categories, an enhanced due diligence should be performed.

Refiners should determine their own criteria for high risk supply chain. However, the following minimum criteria should be considered for high risk categories:

- The Mined Gold or Recycled Gold originates from, has transited or has been transported via a conflict-affected or human right abuse high risk area;
- The Mined Gold is claimed to be originated from a country that has limited known reserves, likely resources or expected production levels of gold;
- The Recycled Gold comes from a country where gold from conflict-affected and human right abuse high-risk areas are known, or reasonably suspected to transit;

- A company in the gold supply chain is located in a country representing high risk for money laundering, crime or corruption;
- A company in the gold supply chain or its beneficial owner is a politically exposed person;
- A company in the gold supply chain is active in a higher risk business activity such as arms, gaming and casino industry, antique and art, diamond merchants, sects and their leaders.

Monitoring of transactions

The Refinery should conduct appropriate scrutiny and monitoring of transactions undertaken through the course of the relationship so as to ensure that the transactions are consistent with the refiner's knowledge of the supply chain and risk profile. Monitoring of transactions should be undertaken by applying a risk based approach.

In this context, the Refinery should receive and document the following information for each lot received:

- For Mined Gold:
    - Identification of each company in the supply chain
    - Bar list with weights and assay results
    - Export form
    - Import form
    - Shipping/transportation documents (Waybill, airwaybill, pro-forma invoice)

- For Recycled Gold:
    - Description of the merchandise
    - Packing list with weights and assay results
    - Export form
    - Import form
    - Shipping/transportation documents (Waybill, airwaybill, pro-forma invoice)

Refiners should verify that the documents are consistent with each other and with its knowledge of the supply chain. The background of transactions which are not consistent should be examined and the findings established in writing.

3. Report risk assessment to designated Senior Management

Senior Management retains the ultimate control and responsibility for the gold supply chain. Senior Management will carefully select and supervise the Compliance Officer and gives him the necessary means to perform his duty.

Senior Management should approve each new supply chain assessed as high risk and should revisit each year the decision to whether to continue with these business relationships or not.

STEP 3 - Design and implement a management strategy to respond to identified risks

1. **Devise a strategy for risk management of an identified risk by either (i) mitigation of the risk while continuing trade; (ii) mitigation of the risk while suspending trade or (iii) disengagement from the risk**

If the result of the gold supply chain due diligence concludes that there is money laundering, terrorist financing, contribution to conflict, human right abuses, or if the possibility of the same is deemed too high, the Refinery should stop immediately to refine gold from this provenance.

If the result of the gold supply chain due diligence concludes that it is possible that there is money laundering, terrorist financing, contribution to conflict or human rights abuse, the Refinery should suspend refining gold from this provenance until it can obtain additional information/data confirming or refuting the preliminary assessment.

Where the result of the due diligence is not fully satisfactory but the assessed company in the supply chain is using reasonable and good faith effort, refiners can continue to refine gold coming from this source provided that it adopts an improvement strategy stating clear performance objectives within a reasonable timeframe.

2. **Where a management strategy of risk mitigation is undertaken, it should include measurable steps to be taken and achieved, monitoring of performance, periodic reassessment of risk, and regular reporting to designated senior management**

The improvement strategy described in section 1 above should state clear performance objectives, including qualitative and/or quantitative indicators in order to measure improvement. A reasonable deadline should be communicated.

The advancement of the plan should be reviewed regularly and the results communicated to Senior Management.

On the deadline, an assessment should be performed in order to determine if the measures have been properly taken. Senior Management should be informed of the results and decide whether to continue dealing with this supply chain.

STEP 4 - Arrange for an independent third-party audit of the supply chain due diligence

Auditor Requirements

Refiners should have their gold supply chain management systems and practices audited by independent and competent third parties, who may include governments.

Audit Procedures

The audit process will be conducted in accordance with the requirements of the international non-financial assurance standards ISO 19011:2002, ISEA 3000 or SSEA 100 standards.

Audit report:

The audit report should include an attestation that:

- The Auditors possess the professional qualifications required;
- The Auditors are independent of the management, staff or shareholders of the audited refinery;
- The Auditors have carried out their audit in accordance with a national or international non-financial assurance standards ISO 19011:2002, ISEA 3000 or SSEA 100 standards;
- The Auditors assessment on the compliance with the LBMA responsible gold guidelines.

In addition, Auditors should make recommendations in the audit report for the refiner to improve their gold supply chain practice.

Audit periodicity:

A full audit should be carried out once every three years within one year after the closing of the financial books. When a full audit is not being carried out, an audit review should be conducted within one year after the closing of the financial books.

Submission of Audit Report to LBMA

Both full audit reports and audit review reports should be submitted to the LBMA Chief Executive via email or hard copy on an annual basis.

STEP 5 - Report on supply chain due diligence

Companies should publicly report on their gold supply chain due diligence policies and practices, with appropriate regard for security, proprietary information, and the legal rights of the other supply chain actors.

Companies should therefore make available to the public their company policy regarding gold supply chain together with the audit report on the compliance with these guidelines.

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The Honorable Mary L. Schapiro
Chairman
U.S. Securities and Exchange Commission

28 October 2011

Dear Chairman Shapiro

The organizations submitting these comments represent the leading worldwide gold industries, from mining and refining through investment, manufacturing and retail sales. We have all previously commented upon the Commission's proposed rule, and we thank the Commission for providing an additional opportunity for comment. We believe that this new comment opportunity is an important development, because, like the Commission, we are all engaged in initiatives to remove the finance of conflict and human rights abuse from gold supply chains, and our experience in these initiatives has given us new insights that we wish to share.

Alignment with the OECD Guidance
The primary point of our comment responds to an issue raised in several Commission questions during the Roundtable: how should the Commission's final rule use or interact with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We are among the many advocates for use of that Guidance to define due diligence under the Dodd-Frank Act. Indeed, we are already aligning our own initiatives to the OECD five step process: the World Gold Council (WGC) Conflict-Free Gold Standard and Chain of Custody Standard; the Responsible Jewellery Council (RJC) Code of Practices and Chain of Custody Initiative; and the London Bullion Market Association (LBMA) Responsible Gold Guidance.

We believe that such alignment of public and private initiatives with the OECD Guidance is important to achieve the goals of the Dodd-Frank Act. Alignment will help to bring about worldwide supply chain due diligence efforts, with focus and resources directed to common and practical solutions, and a more level playing field among competing multinational enterprises. It will reduce administrative burdens caused by disparate requirements and definitions, and free additional resources to support sustainable development. And it will help deter a flight by buyers of these minerals from conflict-affected and high-risk areas caused by initial uncertainty and actions to mitigate risk in light of this uncertainty.

You have noted, however, that while the well-considered OECD Guidance contains a detailed Supplement on Tin, Tantalum and Tungsten, a Gold Supplement now in development has not yet been issued, and the ongoing ICGLR certification system has not yet been applied to gold. The OECD Gold Supplement is not far away; we are all engaged in its development through active participation in the OECD Gold Working Group and its Drafting Committee. However, as with our own initiatives, we anticipate adoption and issuance of the Gold Supplement in early 2012, given the desire to develop this through a multi-stakeholder consensus-driven process.

This timing is problematic for Dodd-Frank Act compliance. It means that at the beginning of 2012 there will be no acknowledged and fully-developed base of guidance for gold supply chain due diligence practices upon which an audit might be performed. The audit advised by the OECD Guidance (Step 4), and contemplated by the Commission, is a performance audit;

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it will determine the conformity of a gold refiner's management system (OECD Step 1) and its due diligence practices (OECD Step 2) to Dodd-Frank Act requirements. However such an audit requires a clear standard to which a management system and practices can be compared and assessed for conformity. In the absence of the OECD Gold Supplement, or the industry initiatives that are being aligned to it, full Dodd-Frank Act gold supply chain due diligence cannot yet be defined, nor achieved, and audits would seem futile outside this framework.

We therefore suggest that the Commission make the final rule applicable to gold at the beginning of an issuer's first full fiscal year following adoption and issuance of the OECD Gold Supplement, anticipated in early 2012. This would be a part of a more broadly applicable specific statement by the Commission that due diligence in conformity to the OECD Guidance and its mineral supplements would be recognized as satisfaction of the due diligence required by the final rule.

This should not be perceived as a delay in gold industry efforts to preclude finance of DRC conflict and human rights abuse from gold supply chains. We are all working diligently, together with leading NGOs, governments and the OECD Secretariat, to create a Gold Supplement, as well as on industry initiatives that can support its implementation. The LBMA Responsible Gold Guidance will require that its sixty-one accredited gold refiners, the first tier of gold refining worldwide, must agree by January 1, 2012, as a condition of continuing LBMA accreditation, to promptly implement an OECD-conforming management system to determine their sources to be conflict-free, with verification of that performance by a third party audit. The RJC Chain-of-Custody Certification standard and WGC Conflict-Free Gold and Chain-of-Custody standards initiatives are expected to be completed in early 2012, and will enable implementation by a broad spectrum of gold supply chain participants and provide confidence that the gold covered by these standards is not fuelling conflict. So a delay in the applicability of the Commission's rule to manufacturers that use gold will not delay achievement of the goals of the Dodd-Frank Act, but will instead put the Act into a consistent worldwide framework that will promote and assist in achievement of the humanitarian goals that we all support.

Recyclable Materials

The Commission asked about requirements for recyclable materials. Gold is one of the most intensively recycled materials, and more than 99.99% of most recyclable gold stocks that are presented for recycling is recovered and transformed into useful materials, for many sound reasons and beneficial effects. Legitimate recycling does not finance conflict and human rights abuse, and the Commission should not hinder such efficient use of scarce resources. Legitimate recyclable material should therefore be subject to different consideration by the Commission, and in particular should not be deemed to be suspect or contaminated with conflict-affected sources, requiring a Conflict Minerals Report. This is not to seek an exemption from due diligence, but instead guidance that a mine of origin cannot and need not be determined. Recyclable gold-bearing materials require appropriate risk-based due diligence to preclude laundering of newly-mined conflict gold through false claims of being recyclable material. There is apparent agreement upon this point in the ongoing rule-making development processes. It is also likely that this will be the guidance of the OECD Gold Supplement and industry initiatives, and the Commission should align the final rule in the same way.

Existing Stocks

The Commission asked if there should be different treatment for existing stockpiles of gold. There should, because these stockpiles cannot now be retrospectively traced back to their mining origins, cannot now finance conflict and abuse of human rights associated with those

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mining origins, and should not be diminished in value. There is apparent agreement upon this point in the ongoing development of the OECD Gold Supplement and industry initiatives, with a proposed threshold date of January 1, 2012. That is, gold in existing stocks will not require determination of a mine of origin if it is verifiably in existence prior to January 1, 2012, subject to the following conditions:

a. This treatment of existing stockpiles applies only to refined gold held in stockpiles of banks and financial repositories. Other existing gold stocks in the form of privately held gold, whether bars or jewelry or any other form, will require due diligence in the manner of recyclable materials, without regard to date of production.
b. The date of existence must be shown by a marking in the gold itself, imprinted at the time of its production, or by inventory records of the bank or repository, made in the ordinary course of its business. The reason for a business record verification is that until recent years it was not common to imprint the year of production into gold bars, and the reserves of many governments are not so imprinted, but inventory records for such gold are common and reliable.

Existing stockpiles described above are not exempt from Dodd-Frank Act applicability and due diligence, but appropriate risk-based due diligence is directed to verify that the above-stated conditions are met. A threshold date based on inventory records for refined gold is considerably easier to determine and verify than a date of mining extraction, and logically the extraction date is prior and thus captured.

Finally, if we can be of further assistance to the Commission with regard to gold supply chains and due diligence, we would be please to respond to any questions or requests.

Sincerely,

Aram Shishmanian	Stuart Murray	Michael Rae
Chief Executive Officer	Chief Executive Officer	Chief Executive Officer
World Gold Council	London Bullion Markets Association	Responsible Jewellery Council