



By E-mail

Chairman Mary L. Schapiro
Commissioner Luis Aguilar
Commissioner Elisse Walter
Commissioner Troy Paredes
Commissioner Daniel Gallagher

Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-1090

Dear Chairman and Commissioners,

The International Corporate Accountability Roundtable (“ICAR”) submits the following IPS News article by Amanda Wilson entitled “Conflict Minerals Law Hold-up Threatens Lives in DR Congo” to the public comment for the Section 1502 rulemaking.

The article notes the lacking implementation of the law due to the delays caused by the Securities and Exchange Commission (“SEC”) in implementing final rules:

“Part of the law would require all companies listed with the Securities and Exchange Commission (SEC) to report whether they are sourcing tungsten, tin, tantalum and gold from areas of the DRC linked to militia human rights abuses.

The rule would force companies to investigate whether their products contain conflict minerals and then report that information to the SEC as part of the public record. In legal terms, the process is called "supply chain due diligence".

But the provision is hung up in a rule-making process at the SEC – the body charged with outlining how that particular provision of Dodd-Frank will be spelled out. The SEC has missed its own deadline to outline rules by eight months. The SEC's website has the task on a to-do list for 2011.”¹

As previously stated in our July 29th, 2011 submission, Section 1502 was prompted by the U.S. Congress' concern "that the exploitation and trade of conflict minerals originating in the DRC is helping to finance

¹ “Conflict Minerals Law Hold-Up Threatens Lives in DR Congo”, Amanda Wilson, IPS News, December 21, 2011. Available at <http://ipsnews.net/news.asp?idnews=106276>

conflict characterized by extreme levels of violence in the eastern DRC..." In order for this provision to be effective in addressing an urgent humanitarian crisis, we urge the SEC to issue the final rules at the earliest opportunity, and to follow the clear intent of the law by allowing no further delays or phase-in periods for implementation and reporting requirements.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Amol Mehra". The signature is fluid and cursive, with the first name "Amol" being more prominent than the last name "Mehra".

Amol Mehra
Coordinator
International Corporate Accountability Roundtable

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Wilson, Amanda. "Conflict Minerals Law Hold-up Threatens Lives in DR Congo - IPS Ipsnews.net." *IPS Inter Press Service*". 21 Dec. 2011. Web. 21 Dec. 2011. <<http://ipsnews.net/news.asp?idnews=106276>>.