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February 21, 2012

Chairman and Commissioners
Securities and Exchange Commission
100 F Street NE
Washington DC 20549-1090

Dear Chairman and Commissioners,

We submit this letter to urge the Securities and Exchange Commission to expedite the release of the final rules for Section 1502 of the Dodd-Frank Act without additional delay; and to issue strong rules with no phase-ins or delays in implementation. We believe that it is important to keep the spirit of the legislation intact, in order to address one of the principal contributors to the urgent humanitarian situation in the eastern Democratic Republic of the Congo (DRC), the trade in conflict minerals.

World Vision implements programs that contribute to the wellbeing of children in three provinces in Eastern DRC. The protracted conflict affecting millions of people, particularly women and children, leads to constant insecurity affecting our beneficiaries and staff. While conflict minerals are not the sole root cause of the conflict, we believe that the mining and sale of these resources are a significant source of financing for armed groups that prey on innocent victims. Our fieldwork and others' research has shown that a large portion of workers involved in artisanal mining are children, posing significant child health and safety risks.

As expressed in our letter dated July 2011 (which is attached), we recommend that the Commission require that disclosures under Section 1502 be filed with, not merely furnished to, the Commission. In addition, companies that fail to determine the origin of the minerals in their products should not be allowed to report them as of indeterminate origin. Rather, corporations must describe them as "Not DRC-Conflict Free" in their Conflict Minerals report; otherwise, it would create an incentive to forgo full due diligence procedures. Furthermore, we share the concern that delays or phase-in periods would diminish the impact of the regulations in cutting off financing to armed groups and demilitarizing mining areas and would provide incentives for companies to delay adopting due diligence efforts.

We strongly support the Commission and the Chairman to finalize the rulemaking process as soon as possible, while keeping the strength and the spirit of the law intact. While we know that Section 1502 of the Dodd-Frank Act is not the solution to all of Congo's problems, we strongly believe that reforming the mining sector, while continuing to reform the security and governance sectors, would greatly improve the lives of millions of Congolese women, men and children.

Truly yours,

Adam Taylor
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Robert Kisiyula
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July 8, 2011

The Honorable Mary L Schapiro
Chairman
US Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Dear Chairman Schapiro,

World Vision* thanks you for accepting public comment on Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, file number S7-40-10.

We respectfully submit the following written comments concerning the proposed Securities and Exchange Commission's regulations and implementation of the Conflict Minerals Provision. The Provision mandates specific disclosures concerning conflict minerals that originate in the Democratic Republic of the Congo, or, an adjoining country.

World Vision is a Christian humanitarian organization that has worked in the Democratic Republic of Congo since 1984. For decades we have also served in its Great Lakes Region neighbors Rwanda, Burundi, Uganda and Tanzania. USAID, other governmental and international agencies, and private donors, have supported our work in the DRC with more than \$165 million of support. With this funding we have served more than 2.5 million people, including internally displaced people (IDPs), poor and vulnerable children, families, and entire communities. Our work has focused on emergency humanitarian protection, food and relief supplies to IDPs (in Eastern DRC), and improving education, health (especially on HIV/AIDS), food security, and water and sanitation.

* World Vision has been serving, and partnering with, vulnerable children and their communities around the world for almost 60 years. Today, we continue this mission in more than 100 countries worldwide, through to the hard work of our 40,000 employees, most of whom are from the country in which they serve. More than 1 million Americans, from every state, supported our work last year with their donations. Because of the human cost of the conflict – especially for children – DRC is a top priority for the World Vision partnership, which includes 22 support offices in countries like Canada, the United Kingdom, and Australia.

Our staff on the ground, and our Congolese partners, witness daily how the illegal exploitation of natural resources contributes to instability in the eastern region and to immense suffering. Mortality rates are staggering. Mass displacement is large-scale. Sexual violence is rampant and often used as a weapon to terrorize and humiliate communities.

There is an urgent need to break the link between violent conflict in DRC and the illegal use of these minerals. A crucial step is to require transparency regarding the origin and supply chain of the minerals, like the type of disclosure required by Section 1502. World Vision played a key role in the creation of this law, working closely with Congressional offices and other non-governmental organizations.

We commend the Commission for its thoughtfully developed proposed rule and recommend the following to ensure that the Rule has its intended effect:

- **Require that disclosures under Section 1502 be filed with, not merely furnished to, the Commission.**
- **Speed up the process of implementation and avoid delays or a phased-in approach.**

We are gravely concerned about the likely consequences on the ground for Congolese civilians if there are delays or a slow, gradual approach. The illicit trade continues to fuel serious human rights violations, including child and forced labor, enslavement of women, sexual abuse, and various illegal taxes, in and around mining communities in the East. Efficient, effective implementation will help to address the linkages between mineral exploitation and funding for illegal armed actors in the region.

We have observed on-the-ground that uncertainty about the timing of implementing the law has already led some legitimate companies and buyers to stop buying minerals from Eastern DRC. With the ongoing and increased uncertainty, more companies may follow suit, which would negatively impact a wide range of people, from miners to buyers. This in turn impacts ordinary Congolese who depend on the mining industry to earn a living, support their families, and survive. An end to legal purchasing, which would harm already very low-income Congolese, was not the intent of the legislation.

- **Adopt a clear framework for steps that issuers must take (1) to satisfy the reasonable country of origin inquiry standard, and (2) to execute appropriate and effective due diligence on the source and chain of custody of conflict minerals.**

Clear guiding principles and standards ensure effectiveness. We urge the SEC to adopt the Organisation for Economic Co-operation and Development (OECD) guidelines on responsible supply chain management of conflict minerals. These guidelines are necessary for harmonizing all aspects of implementation with widely-endorsed, existing practices and policies.

World Vision agrees with the Commission that:

- **The regulations should not exempt any class of issuer.**
- **Issuers should be required to maintain reviewable business records for at least five years.**
- **Extraction (mining) should be considered as “manufacturing” when issuers extract, or contract, to extract conflict minerals.**
- **The regulations should prescribe a clear definition of “recycled” or “scrap” conflict minerals in order to prevent companies from circumventing disclosure.**

We look forward to working with you to ensure that the implementation of the Conflict Minerals Provision is successful and expeditious. We are available at any time to answer your questions. Thank you for your time and attention.

Sincerely,

Adam Taylor
Vice President for Advocacy, World Vision US