



August 16, 2012

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

Re: Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank”)

Dear Secretary Schapiro:

As a leading producer of tantalum ore and processed products, I am writing this letter on behalf of Global Advanced Metals Pty Ltd and its subsidiaries (“GAM”) regarding the upcoming meeting related to “conflict minerals” and Dodd-Frank. We are pleased to see the Securities and Exchange Commission (“SEC”) set a date for this meeting to potentially vote on the rules. GAM believes that strict adherence to Dodd-Frank along with a short phase-in period is both socially responsible and financially feasible.

For many years GAM has lead the charge among tantalum producers to ensure a socially responsible and “conflict free” supply chain. GAM owns the largest known ethical source of tantalum ore at our Western Australia based mines and also has a smelting/processing operation which processes tantalum ore for the electronics, aerospace, automotive and other industries at our U.S. and Japanese based facilities. In addition to our mines, we have continuously sourced ethically produced, “conflict free” tantalum raw material throughout the world for our smelting/processing operations.

We believe that GAM has demonstrated that producers and end users of tantalum can reject “conflict mining” and utilize “conflict free” sources while doing so at minimal expense. Several leading U.S. Original Equipment Manufacturers (OEMs) have already taken the lead in undertaking due diligence efforts to identify and eradicate the use of “conflict minerals” from their supply chains. A number of industry associations (e.g., EICC, GeSI and AIAG) are developing a standard template for their members to simplify the process of tracking “conflict minerals” throughout the supply chain.

The EICC and GeSI have also worked to develop a comprehensive audit process to identify “conflict free” producers of tantalum and other “conflict minerals.” OEMs can easily identify “conflict free” producers and suppliers who have passed this audit through the EICC website. As the first processor of any metal type to be audited and declared “conflict free” under the EICC/GeSI Conflict Free Smelter program, GAM firmly supports clear and immediate regulation to increase participation and urgency on this important issue throughout the relevant industries.

We respectfully request that the SEC act to pass rules that will ensure swift action toward a “conflict free” supply chain in the U.S. and hope that the international community follows suit.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "B. A. Ellis". The signature is written in a cursive style with a large initial "B" and "E".

Bryan A. Ellis
CEO, Global Advanced Metals Pty Ltd