

Libyan Transparency
Association



جمعية
الشفافية الليبية
لتعزيز الشفافية و مكافحة الفساد

Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-5546

22nd February 2012

Dear Secretary Murphy,

The Libyan Transparency Association appreciates the opportunity to provide comments to the Securities and Exchange Commission on the proposed rules regarding the Disclosure of Payments by Resource Extraction Issuers to implement Section 1504 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. We are a non-governmental organization formed in the early days of Libya's revolution which advocates for transparency and accountability in Libya, including in the business practices governing the extractive industries in Libya.

In the past, Libya's oil and gas sector was abused by Gaddafi and his cronies who used its revenues to maintain power, quash any opposition, fund terrorism and oppress the civil liberties and human rights of Libyans. We recently celebrated the one year anniversary of our revolution on February 17th, the aims of which included respect for human rights as well as an end to corruption and mismanagement in the natural resource sector and other sectors.

The Libyan Transparency Association believes that Section 1504 is a great opportunity for Libya to obtain information to continue to combat corruption and demand accountability and transparency for our use of natural resources. With greater transparency regarding payments in the oil and gas sector, we will be able to hold our soon to be newly elected government accountable and ensure that the natural resources benefit all Libyan citizens and not only a small elite. Ultimately, we believe that a transparently managed oil and gas sector could prove the catalyst for much-needed development and stability in the country.

The purpose of this letter is to support the recommendations and comments on the proposed rules submitted to you by the Publish What You Pay (PWYP) coalition.

Specifically, we agree with PWYP that no exemptions should be provided and that the Commission should define "project" in relation to each lease, license and/or other concession level arrangement entered into by a resource extraction issuer.

In Libya, our extensive oil and gas operations are spread across a large number of areas, but resource rents have historically not been fairly distributed to those communities where the resources are located. We believe that the disclosure of company payments at the project level is crucial for local communities in order to ensure that civil society groups like us can hold both our national and local governments accountable to ensure that the full local benefits of project development are delivered and equally distributed amongst communities.

Yours sincerely,

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