

March 15, 2017

Michael Piwowar  
Acting Chairman  
Securities & Exchange Commission

RE: Comments on the SEC Conflict Minerals Rule

Dear Commissioner Piwowar,

We are writing in support of the Conflict Minerals Rule. This rule promotes supply chain transparency and consumer choice, and, critically, is making progress towards improved humanitarian conditions and wildlife protection in the conflict-torn eastern Democratic Republic of Congo (DRC) and its neighboring countries.

The eastern Democratic Republic of Congo (DRC) where much mining activity is centered is home to the entire population of the Grauer's gorilla (*Gorilla beringei graueri*). DRC, Uganda and Rwanda are home to the only existing populations of the mountain gorilla (*Gorilla beringei beringei*). Both gorillas are listed as Critically Endangered on the IUCN Red List of Threatened Species ([www.iucnredlist.org](http://www.iucnredlist.org)). Other important Red Listed species in the Congo Basin are the Vulnerable forest elephant (*Loxodonta cyclotis*), Endangered okapi (*Okapia johnstoni*, endemic to DRC), and the Endangered eastern chimpanzee (*Pan troglodytes schweinfurthii*). The survival of these species is threatened by illegal hunting for food (bushmeat) and wildlife trade, as well as habitat destruction. Illegal wildlife poaching and trade in the region is fueled by armed groups and mining. Militia and mining activities further spur habitat destruction.

Human communities in the Congo Basin also suffer from armed group activities, unregulated mining and associated natural resource destruction. Weakening or suspending the Conflict Minerals Rule would incentivize armed groups in DRC to again engage in local mines. Increased mining and violence in the Congo Basin will inevitably accelerate illegal hunting pressure and forest destruction, threatening both wildlife and human communities. Increased instability also creates risks for U.S. businesses operating in the area.

The Conflict Minerals Rule does not prevent US businesses from using minerals sourced from the Congo Basin. What the rule does do is enable improved transparency and consumer choice through providing information about companies' conflict minerals sourcing practices. Recent reports indicate there are now more than 200 mines and smelters in the Congo region that have been certified as "conflict-free," and that regional exports of minerals have increased, demonstrating market demand for certified conflict free minerals.<sup>1</sup> Major US companies including Apple, Intel and Tiffany & Co. have committed to keeping their supply chains conflict mineral free.



**WILDLIFE  
IMPACT**

wildlifeimpact.org

We oppose any suspension, weakening, or repeal of the Conflict Minerals Rule. We urge you to keep the Conflict Minerals Rule fully intact, and to fully enforce the Rule moving forward.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Julie Sherman', with a long horizontal flourish extending to the right.

Julie Sherman  
Executive Director

1. [https://www.washingtonpost.com/business/economy/why-apple-and-intel-dont-want-to-see-the-conflict-minerals-rule-rolled-back/2017/02/23/b027671e-f565-11e6-8d72-263470bf0401\\_story.html](https://www.washingtonpost.com/business/economy/why-apple-and-intel-dont-want-to-see-the-conflict-minerals-rule-rolled-back/2017/02/23/b027671e-f565-11e6-8d72-263470bf0401_story.html)