



April 28, 2017

Andrew Weinschenk
Office of Threat Finance Countermeasures
Department of State

RE: Submission with respect to the Notice of Stakeholder Consultations on Responsible Conflict Mineral Sourcing

Dear Mr. Weinschenk,

Please accept this joint response from Partnership Africa Canada (PAC) and the Coalition of Civil Society Organizations in the Great Lakes Region against Illegal Exploitation of Natural Resources (COSOC-GL) to the request for comments in the US State Department's Notice of Stakeholder Consultations on Responsible Mineral Sourcing. We are a group of organizations that have been deeply involved in the effort to curb the illicit flow of minerals from Africa's Great Lakes region at the national, regional and international levels, and as such we welcome the opportunity to provide input into this consultation.

COSOC-GL is a regional, independent, non-profit, non-political and non-religious organization working across the Great Lakes region of Africa. The coalition's objectives include, among others, the transparent and responsible management of conflict-free natural resources, including the respect of fundamental human rights in the Great Lakes Region, and the effective participation and ownership by local communities in the management of natural resources in order to promote peace, security, stability and sustainable development in the region.

Partnership Africa Canada is a global leader in developing innovative approaches to strengthen natural resource governance. For 30 years, we've collaborated with partners, such as COSOC-GL which we helped to launch in 2011 and which we continue to collaborate with and provide technical and financial support to.

Our work to investigate the lack of accountability, poor governance and human rights violations associated with conflict minerals, as well as implement solutions to end their illicit trade, includes supporting the development of clean supply chains.

PAC is a technical partner to the International Conference on the Great Lakes Region (ICGLR)¹, supporting their efforts to end the illegal trade of natural resources. As part of PAC's efforts to support the strengthening of natural resource governance in the Great Lakes Region, PAC is piloting the Just Gold

¹ For more information about the ICGLR, please visit their website at www.icglr.org.

project that has created the first chain of custody system for conflict-free, legal and traceable artisanal gold in the Democratic Republic of Congo, proving that it is possible to track the gold supply chain to the source.

Our Recommendations

PAC and COSOC-GL are strong supporters of Section 1502 of the Dodd-Frank Act, and believe that this important piece of legislation has significantly contributed to growing political and private sector willingness to tackle the issue of conflict minerals in the Great Lakes Region of Africa. We understand the US government is considering repealing this legislation, and would like to make it clear that we believe that repealing such legislation would have a detrimental impact to responsible sourcing efforts in the region, as it would undermine the meaningful gains made in securing political will in the region to address the trade in conflict minerals. If the US government were to repeal Section 1502, not only will it be seriously jeopardizing political will, but it will send the signal to warlords and smugglers that the world is indifferent to corrupt, exploitative and possibly violent practices.

While we believe it is essential for this legislation to remain in place, we remain supportive of the US State Department's effort to identify complementary measures that can be taken in order to support responsible sourcing efforts in the region.

Beyond our recommendation for maintaining and continuing to support section 1502 of the Dodd-Frank Act, PAC and COSOC-GL recommend that the US State Department includes the following in its efforts to support responsible sourcing from the Great Lakes Region of Africa:

- Contribute to certification and traceability efforts in-region by offering political and financial support to the member states of the International Conference on the Great Lakes Region (ICGLR) for their implementation of the six tools of the Regional Initiative on Natural Resources (RINR). Particular elements in need of support include:
 - Broad sensitization across all 12 ICGLR Member States about how to create and sustain the conditions for responsible sourcing in alignment with the Regional Certification Mechanism (RCM) of the ICGLR and the OECD Due Diligence Guidance on Responsible Supply Chains;
 - Support for the development and implementation of ICGLR-compliant mine site inspections and export procedures;
 - Introduction or scaling up of transparent chain of custody systems for 3Ts and gold; and
 - Harmonization and streamlining of 3rd party audit processes in line with the ICGLR Regional Certification Mechanism.

The capacity building and resourcing of ICGLR member states to govern and manage the extraction and movement of minerals within their borders is imperative for halting the trade of conflict minerals.

- Contribute to the formalization of artisanal mining in the Great Lakes Region, with special attention to ensuring that the formalization process does not disenfranchise vulnerable actors in and close to the supply chain, such as women, the elderly and youth. Such contributions could take the form of support for legislative and regulatory changes that enable ASM producers to become part of the formalized economy, or may also assist with technical support that enhances their ability to mine in a safer and more environmentally friendly manner. Support should also be provided for the dissemination and demonstration of best practices throughout the region so as to ensure that national legal and policy frameworks are conducive to formalization and improved livelihoods for men, women and children.
- Continue to participate in and support responsible sourcing forums, such as the OECD Due Diligence Guidance on Responsible Supply Chains and the Private-Public Alliance for Responsible Minerals Trade, and encourage US-based companies to actively participate.
- Identify opportunities to promote awareness and implementation of the OECD Due Diligence Guidance, the internationally recognized minimum standard for due diligence in mineral supply chains, to US-based companies.
- Support civil society in-region who are working to ensure the creation and maintenance of a whistleblowing and monitoring process for supply chains in the region. Civil society in the region has an essential role to play when it comes to ensuring appropriate levels of oversight over responsible supply chains in the region, and will serve to improve the credibility of these supply chains for the international market.

We appreciate the opportunity to provide the US State Department with these measures for consideration, and welcome the opportunity to continue engaging with you on how to best support the US government's efforts to promote responsible sourcing and complement Section 1502 of the Dodd-Frank Act.

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