

SURVEY ON CONFLICT MINERALS AND DUE DILIGENCE

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KEY RESULTS

The surveyed companies are almost all affected by the Dodd-Frank Act on conflict minerals and have already begun to implement due diligence procedures.

The main challenges are to motivate suppliers to deliver the requested information and to increase the reliability of supplier information. A further difficulty is to identify certified suppliers / smelters.

Most companies participate in some form of cooperation relevant to the topic of conflict minerals, although only one is actually actively participating in a certification scheme for suppliers. The majority of companies engage with a responsible supply chain initiative.

The most common due diligence processes implemented are supplier questionnaires and internal training of procurement employees, followed by the implementation of a supplier policy on conflict minerals and training of suppliers.

(1) INTRODUCTION AND METHODOLOGY OF THE SURVEY

Mining in Central Africa has been associated with violent conflict, mistreatment of artisanal miners, illegal trading and the diversion of state funds. The plunder of natural resources and other forms of wealth of the Democratic Republic of the Congo (DRC) has been intimately associated with regional-scale conflict dynamics in Africa's Great Lakes Region. The term conflict minerals is used for minerals mined in conditions of armed conflict and human rights abuses [1].

The issue of conflict minerals is not new and already at the beginning of this century, the process to stop the trade in "blood diamonds" was started. Concerning other conflict minerals, the first calls for a traceability and certification scheme were raised by the UN in 2005. Then, on August 22, 2012, the U.S. Securities and Exchange Commission (SEC) approved a final rule, as mandated by the Dodd-Frank Act, requiring certain issuers to publicly disclose their use of conflict minerals (tantalum, tin, tungsten, and gold or 3TG) and whether those minerals originated in the Democratic Republic of the Congo (DRC) or adjoining countries. Among other things, issuers subject to the rule will have to conduct a comprehensive assessment of their supply chain activities to determine whether their conflict minerals originated from a covered country. This means that even though a company may not be required to report directly to the SEC, its customers or its customers' customers may have reporting obligations. Those entities may require their suppliers to conduct similar inquiries and due diligence for purposes of their own conflict minerals obligations. The due diligence measures implemented, must adhere to the standards of the OECD 'Due Diligence Guidance for responsible supply chain of minerals from conflict-affected areas' in May 2011 (revised in July 2012). A

coalition of business groups petitioned the U.S. Court of Appeals for the D.C. Circuit for review of the rule, but this challenge was rejected by the D.C. Federal District Court in July, 2013. There has been another appeal filed in September, 2013, but even if the rule is struck down, the legislation behind the rule would remain intact. [2, 6]. Furthermore, other minerals may be added at the discretion of the Secretary of State [3].

The European Union is also working on a new proposal concerning conflict minerals. In September, 2013, there was a public hearing on the topic and the results of this hearing will go into a report called "Promoting development through responsible business practices, including the role of extractive industries in developing countries". This report may be released by the end of October, at the very latest by the end of the year [4]. Although the EU Commissioner for Trade, Karel De Gucht, has confirmed that the EU is currently focusing on 3TG (Tantalum, Tungsten, Tin and Gold), industries other than mining (e.g. logging) are under discussion for regulation, as are regions outside of Africa (e.g. Latin America) [5].

Survey

WEC was approached by Merck KGaA to conduct a survey on the implementation of due diligence processes within the context of conflict minerals. In close cooperation with Merck, a questionnaire containing 7 close-ended questions was put together, with possibilities to make own comments, and sent to all WEC members. 6 WEC members and one external consultant responded (until recently in charge of conflict minerals at OSRAM).

Participants:

- Boeing (US)
- CH2MHILL (US)
- Comsensus (previously engaged with OSRAM) (DE)
- DuPont (US)
- F. Hoffmann – La Roche (CH)
- Ricoh (JP)
- Volkswagen (DE)

WEC has also supplemented the survey results with desk research on the topic, thereby putting the survey findings into a broader context:

(2) TRANSPARENCY IN THE SUPPLY CHAIN OF CONFLICT MINERALS

Challenges

Although the intentions behind the Dodd-Frank Act and other calls for increased transparency in the supply chain of conflict minerals are laudable, the regulation raises a number of challenges to complying companies. Interestingly enough, increasing costs seems not be the most important one, even though the cost argument was prominently used for the appeals against the Act [4]. Instead, the problem is one of **confidentiality in the supply chain**- suppliers deep in the supply chain cite concerns around this issue, something which has limited the ability to gain transparency [9]. This also corresponds with the results of the WEC survey (please see (3) for more detailed information on the results) where 5 out of 7 respondents stated that one major challenge is the fear of the supplier to disclose information. A possible solution to this problem is the implementation of contract clauses and non-disclosure agreements and using data collection and roll-up tools that do not require listing of all suppliers used within a company's supply chain [8, 9].

Another challenge is the **reliability of supplier information** and again this issue was confirmed by the companies participating in the survey. This is probably at least partly caused by the fact that there is still a **lack of incentives for the suppliers to comply**. Apparently, there is still a need to explain the benefits of a transparent supply chain through capacity building and supplier training. Another way that end-user companies are trying to handle this, is to identify conflict-free smelters and have their own suppliers source from these only and verify this through own due diligence on smelters. Industry organizations such as the Electronic Industry Citizenship Coalition (EICC) and Global e-Sustainability Initiative (GeSI) are taking the lead in this effort, developing tactics to aid in tracking and reporting that could potentially help companies

certify that they are not getting any raw materials from mines where warlords use forced labor and commit atrocities to finance their activities [6]. Furthermore, there are also **problems with on-the-ground traceability and tagging systems**, including duplicate tags, tags appearing in the wrong places, and bag weights increasing between négociant and comptoir (upstream companies). There have also been cases reported with tagged but opened bags of minerals [7]. Thus, more efforts are needed to educate smelters on the issue of minerals sourcing from conflict-affected areas. One of the main challenges is also the **lack of smelter willingness to participate in collaborate processes** underway to develop due diligence and trace minerals to their sources. For example, smelters have been slow to participate in the Conflict-Free Smelter (CFS) program and apply for conflict-free audits [8]. In September 2013, there were only 66 smelters/refiners that participated in the CFS Program initiated by EICC [10]. Considering the fact that there are about 400 active smelters globally [6], there is still a lot of work to be done. Finally, a major challenge is to **avoid the establishment of a DRC-free supply chain rather than a conflict-free supply chain**, something which would have the complete reverse effect to the one intended with the implementation of the Dodd-Frank Act.

Best practices

Strategy

With regards to a strategy on conflict mineral sourcing, there are mainly two different approaches to choose from – either to simply comply with the reporting requirements or to try to source conflict free. That might not be an easy decision and a company's board of directors needs to be involved in deciding between these alternatives [6]. On the one hand, committing to using only conflict-free materials can involve paying higher costs for those materials. On the other hand, a company risks falling behind with respect to reputation and goodwill if its products include conflict minerals from the affected areas while its competitors commit to a conflict-free business plan.

Policy

Usually, a policy on conflict minerals includes a company's commitment, due diligence activities, and supplier requirements. Some policies include companies' expectations of all suppliers related to human rights and ethical business conduct for all suppliers. In most cases, the policies urge suppliers to require the same expectations of their own suppliers to ensure alignment throughout the supply chain. Policies also acknowledge the gravity of the DRC conflict, specify product categories where 3TG are used, communicate the company's grievance mechanism, and describe industry-wide collaboration and other engagements. Some companies have incorporated policies into their broader supplier codes of conduct, which are available on human rights and responsible purchasing sections of their websites. These policies are updated on an annual basis to reflect the evolution of company positions. Generally companies prefer to focus their policies on elements considered to be directly within their sphere of control, rather than activities occurring multiple tiers up the supply chain. Some policies also try to align with Annex II of the OECD Guidance [8, 11]. Challenges in this context include the need to ensure that policies are not promising results that companies are unable to uphold, managing expectations for controlling the behavior of upstream actors where there is no direct relationship and drafting a concise policy that is understandable for all suppliers [8].

Team

The compliance of the Dodd-Frank Act is a complex task and therefore most companies have assembled a cross-functional team consisting of e.g. legal counsel, CFOs, procurement and supply chain personnel, IT personnel, and internal auditors, engineering, and communications personnel [6, 8]. It may be worth considering also involving R&D, in order to understand the types of material that will be needed in new products [6]. It is important, that the team is empowered within the company and has the backing of management so that employees across the company will make compliance a priority. Companies that have a chief compliance officer many times are turning over leadership of this task to that person. But leadership can come from a variety of functions, including the general counsel, internal audit, finance and procurement [12].

Data collection & communication

The most commonly referenced data collection method cited among multinational companies participating in an OECD pilot project, is the EICC & GeSI Reporting Template and Dashboard. Nearly 30 percent of respondents (out of 28 multinational companies) rely on it as their primary mechanism for obtaining information from their suppliers about material content, smelters used, and/or country of origin. Another 37 percent are using the EICC & GeSI template in combination with their own mechanism [8]. The way suppliers are selected and prioritized for communication and data collection varies. Pilot participants are either communicating with all suppliers (or Tier 1 suppliers) or applying a risk-assessment methodology to

determine which suppliers receive communications and information requests. For companies with several thousand suppliers, a risk-assessment methodology is recommended. To a growing extent, there are also commodity lists available on products that contain 3TG and that can be shared more broadly among companies. Companies are employing various modes of communication including letters, webinars, supplier events and face-to-face meetings [8].

Compliance & confidentiality

Companies use contractual clauses and terms and conditions to ensure compliance of suppliers with data disclosure and/or required policies as a prerequisite for doing business. One major challenge in this context is the fact that, new clauses can often only be added to supplier contracts as they are signed or renewed. Therefore, it may take several years for a company to add conflict mineral clauses to all supplier contracts, depending on the duration of the existing contracts [8].

To overcome the issue of confidentiality, companies are working with their suppliers, both individually and as an industry, by working it into their contract clauses and NDAs (nondisclosure agreements) and using data collection and roll-up tools that do not require listing of all suppliers used within a company's supply chain. However, the standardized Conflict Minerals Reporting Template (developed by EICC and GeSI) can help companies overcome this issue of confidentiality [13].

There is also a need to validate the data gathered from suppliers. This is usually done manually, involving consistency checks against lists published by Conflict Free Smelters [10], application of industrial and technical knowledge and using common sense (e.g. checking smelter names and addresses) [8].

Risk management

Major components of a risk management strategy are 1.) general supplier communications and trainings with key suppliers; 2.) setting clear requirements through policies and contractual clauses and 3.) implementing an internal review process of non-compliant suppliers. Here, various methods are used, e.g. lean Sigma Six techniques, category management or predictive risk modeling [8]. Since most companies probably will not have a direct relationship with smelters, it is difficult to mitigate risks associated with smelters on their own. Therefore, many companies engage in industry-wide collaboration initiatives and/or cooperation with NGOs (e.g. the Conflict-Free Smelter Program).

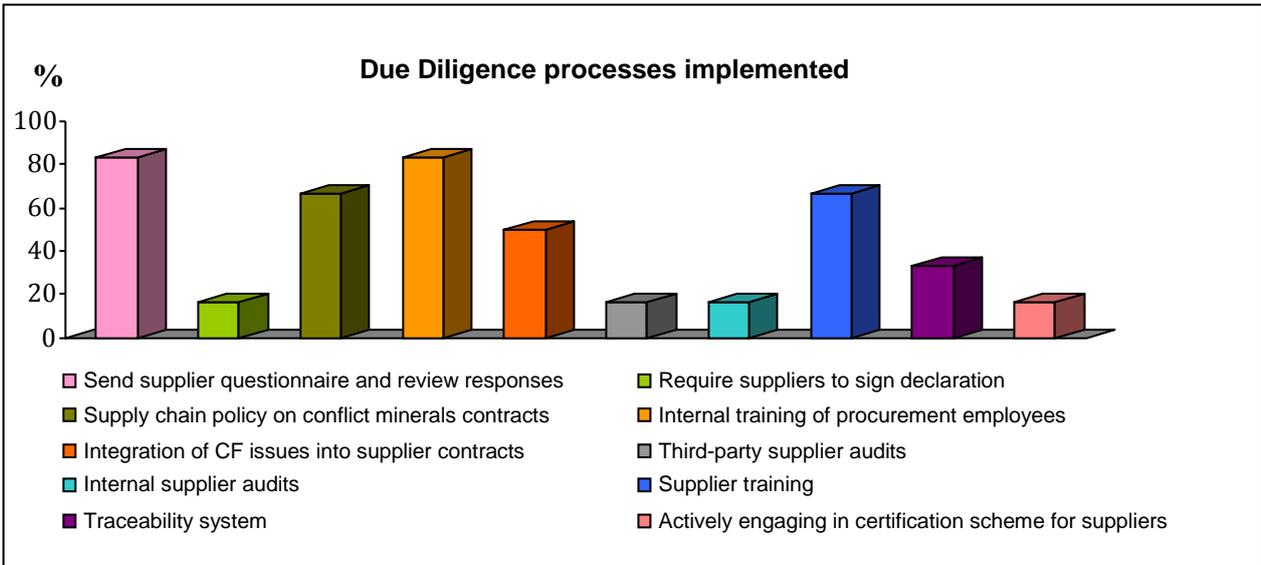
(3) EVALUATION OF COMPANY RESPONSES

All companies but one stated that they are affected by regulations on conflict minerals and that this is not limited to the area of the Great Lakes Region (DR Congo and adjoining countries). Accordingly, they have also received external requests for information on conflict minerals. These inquiries have mainly come from customers, but also from industry associations and peer companies. So far, none have received inquiries from NGOs.

All companies affected by conflict minerals regulation have already implemented due diligence procedures to some extent, with the most common being supplier questionnaires and internal employee training followed by the implementation of a supply chain policy on conflict minerals and supplier training (see chart 1 below).

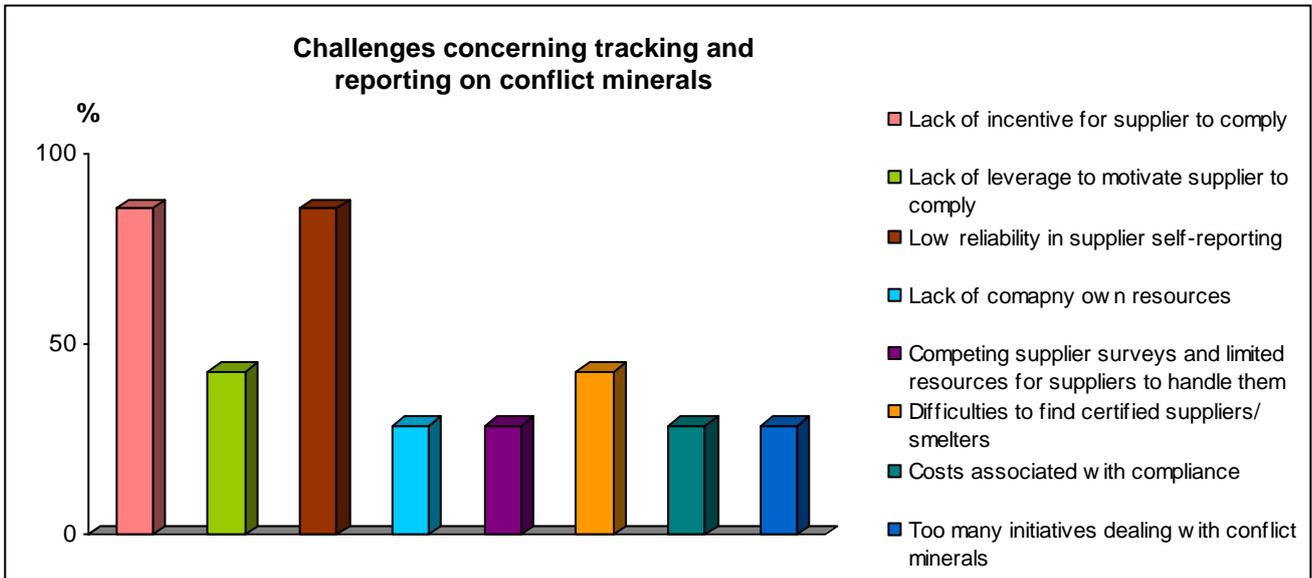
Only one company is utilizing third-party supplier audits, a confirmation of the fact that most companies do not have direct relationships with smelters and consider up-stream activities to be outside their realm of responsibility. Instead, they are relying on industry wide initiatives, although only one company is actually actively participating in such collaboration. However, if one looks at how many companies are more passively cooperating with different organizations relevant to conflict minerals, there is a different picture. Here, four out of seven state that they are involved in responsible supply-chain initiatives, and three are participating in industry-wide cooperation to build capacity to conduct due diligence. Cooperation between up-stream and down-stream companies has also been stated by three companies as being an important activity. Engaging with NGOs and/or civil society organizations seems, on the other hand, not to be of very high priority; only 2 companies are involved in this type of activity.

Chart 1



Concerning challenges that the surveyed companies have experienced in the context of conflict minerals, the most important issues involve the supplier information. Again this confirms the results of other surveys made, as well as the experiences of the OECD pilot participants [8, 13]. The biggest problem areas are the fear of suppliers to disclose information on their supply chain on the grounds of competitiveness, the reliability of supplier information and their lack of incentive to comply with conflict minerals standards.

Chart 2



A further issue is the difficulty of finding certified suppliers / smelters. This problem will most likely remain for some time, although the number of certified smelters is growing. Connected to this is the fact that smelter names keep changing due to mergers or business closure.

An area that has been very much highlighted, specifically within the context of appeals to the Dodd-Frank Act, is the cost of compliance for companies that have to report on conflict minerals. This, however, does not seem to be such a big problem in the eyes of the surveyed companies – only two have stated that compliance costs and internal company resources are major challenges they have to cope with.

(4) CONCLUSIONS

The issue of conflict minerals is highly complex and poses a number of challenges, not only to companies complying with the SEC rule, but also to other actors involved such as NGOs, local governments and artisanal and small-scale mining (ASM) companies in the Great Lakes region. There is some evidence that exports of tin, tantalum and tungsten (3T) from the conflict region in Africa has decreased at the expense of ASM, which often constitutes the main source of income for individual families in the region [7]. On the other hand, gold smuggling seems to have increased [19].

Companies affected by the regulation on conflict minerals therefore need to carefully consider which strategy to choose – to avoid sourcing from the conflict region altogether or to try to source conflict-free from all geographical locations, including DR Congo and its adjoining countries. The latter is most probably associated with higher costs than the former – while 75 percent of the OECD pilot participants encourage responsible sourcing from conflict and high-risk areas, only 25 percent of a broader group of companies takes this approach. This is most probably due to the burden of the Dodd-Frank requirement to file a Conflict Minerals Report and have it audited [13]. On the other hand, the more certified smelters there are, the easier it will be to source conflict-free. Therefore, it is highly recommended to engage in industry-wide initiatives such as the Conflict-Free Smelter Program in order to support certification programs as well as the standardization of reporting templates.

Companies can also look to other industry initiatives to gather more experience on transparency across the supply chain. Initiatives that may have associated insights and learnings applicable to the issue of minerals from conflict-affected areas are [8]:

- EU's REACH legislation and compliance obligations: The chemical information encrypting and decrypting service OR2IS protects its confidential information.
- The Kimberly Process for diamonds employs a bottom-up process to push information to the end-user, rather than a top-down process where the end-user companies are trying to work their way upstream in the supply chain.
- End of Life Vehicle (ELV) directive, referencing the established reporting and auditing mechanisms
- ISO 26000
- ROHS, which required industry collaboration to create a reporting template

One of the greatest challenges for downstream companies is the difficulty of retrieving reliable supplier information. To help suppliers understand the importance of this, enhanced supplier communication and training is needed. This, together with contractual clauses and policies on conflict minerals improve the willingness of suppliers to respond to information requests. Downstream companies without direct smelter relationships have tailored their due diligence practices to reflect their specific positions in the supply chain, and they have implemented relevant recommendations from the OECD Guidance accordingly. Therefore, downstream participants are focusing their efforts, per the Guidance, on the "internal controls over their immediate suppliers," which are their tier-1 suppliers. Companies have undertaken efforts to build these suppliers' due diligence capacity. [13]

Finally, it is important to note that the Dodd-Frank Act is most probably going to be followed by EU regulation on conflict minerals and that this regulation might not be limited to the Great Lakes Region. Other areas under discussion concern e.g. Latin America. The discussions at EU level also include materials other than 3TG such as timber. Not to forget is the debate on social and environmental aspects in general across the supply chain, including issues like working conditions, child labour and environmental degradation. Thus, the trend towards a more institutionalized transparency in the supply chain is definitely here to stay, and companies are wise to invest in traceability systems and to engage more actively with their suppliers.

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(6) ANNEX I

Survey results

Is your company affected by the SEC rule of the Dodd-Frank Act (either as a US listed company or as part of the supply chain of a listed company)?

Response options:	Responses:
Yes	85,71% (6)
No	14,29% (1)
Total number of responses	7

Is your company potentially affected by any regulation/ industry initiative on conflict minerals with a global scope (i.e. not limited to minerals originating in the DRC)?

Response options:	Responses:
Yes	85,71% (6)
No	14,29% (1)
Total number of responses	7

Has your company already received external inquiries concerning conflict minerals? (Please select all that apply)

Response options:	Responses:
customer	85,71% (6)
NGO	0% (0)
industry association	14,29% (1)
peer company	28,57% (2)
investor	0% (0)
gov. procurement agency	0% (0)
not applicable / not sure	14,29% (1)
Total number of responses	7
Comments (1): ... and clients	

Have you already established or are planning to establish any Due Diligence processes (for instance in accordance with the OECD Guideline for responsible supply chain of minerals from conflict affected areas), to ensure your sourced products are free from conflict minerals?

Response options:	Responses:
Yes	85,71% (6)
No	14,29% (1)
Total number of responses	7

If yes, please select all that apply

Response options:	Responses:
send supplier questionnaire and review responses	83,33% (5)
require suppliers to sign declaration	16,67% (1)
supply chain policy on conflict minerals contracts	66,67% (4)
internal training of procurement employees	83,33% (5)
integration of conflict mineral issues into supplier contracts	50% (3)
third-party supplier audits	16,67% (1)
internal supplier audits	16,67% (1)
supplier training	66,67% (4)
traceability system for identification of upstream mineral sources	33,33% (2)
actively engaging in a certification scheme for suppliers	16,67% (1)
Total number of responses	6
Comments (1): membership in 3rd party CM efforts - conflict free smelters, etc.	

Do you cooperate / intend to cooperate with any initiatives that deal with this issue? (Please select all that apply.)

Response options:	Responses:
industry-wide cooperation in building capacity to conduct due diligence	50% (3)
cost-sharing within industry for specific due diligence tasks	33,33% (2)
participation in responsible supply-chain initiatives	66,67% (4)
coordination between industry members who share suppliers	33,33% (2)
cooperation between upstream and downstream companies	50% (3)
building partnerships with international and civil society organizations	33,33% (2)
not aware of any industry co-operations/ initiatives on the topic	0% (0)
Total number of responses	6
Comments (1): In an industry working group for information gathering/sharing on this topic.	

What challenges have you experienced / do you anticipate concerning tracking and reporting on conflict minerals? (Please select all that apply.)

Response options:	Responses:
fear of disclosing information (supplier)	71,43% (5)
lack of incentive for supplier to comply	85,71% (6)
lack of leverage to motivate suppliers to comply	42,86% (3)
low reliability in supplier self-reporting	85,71% (6)
lack of own company resources	28,57% (2)
competing surveys sent to suppliers and limited resources (for suppliers) to handle them	28,57% (2)
difficulties to find certified suppliers / smelters	42,86% (3)
costs associated with compliance	28,57% (2)
too many initiatives dealing with conflict minerals	28,57% (2)
Total number of responses	7

(6) ANNEX II

Organizations

Industry organizations such as the **Electronic Industry Citizenship Coalition (EICC)** are leveraging the work of multiple companies to find common methods for suppliers to provide information on sourcing of their raw materials to end users. Under the Conflict-Free Smelter Initiative, EICC and the **Global e-Sustainability Initiative (GeSI)** have created a process for certifying that participating smelters are getting their raw materials from conflict-free sources, which ultimately could establish the smelters as the key verification point for companies large and small [6, 10]. Also, organizations are establishing processes in the affected countries to trace minerals from their extraction point at reputable mines to a point of export to smelters that are certified as conflict free. **Solutions for Hope** and the **Conflict-Free Tin Initiative** have set up systems to enable on-the-ground traceability of conflict minerals in the affected countries. **The Public-Private Alliance for Responsible Minerals Trade** also plans to develop validated, certifiable, traceable conflict-free supply chain routes and the certification scheme of the **International Conference on the Great Lakes Region** is also integrated into the Conflict-Free Smelter Program.

Tin Supply Chain Initiative of the International Tin Research Institute

The International Tin Research Institute and Tantalum-Niobium International Study Centre have made a significant contribution to their members' due diligence implementation, foremost through the implementation of the Institute's Tin Supply Chain Initiative. The Initiative has also helped to build Democratic Republic of the Congo government capacity in the mining sector, to safeguard the livelihoods of miners at tagged mining sites and, to reduce corruption among State officials in the mining sector [7].

The Electronic Industry Citizenship Coalition (EICC)

The EICC is a coalition of the world's leading electronics companies working together to improve efficiency and social, ethical, and environmental responsibility in the global supply chain [15]. EICC membership is open to electronic manufacturers, software firms, ICT firms, and manufacturing service providers, including contracted labor, that design, market, manufacture and/or provide electronic goods or other materials or services to ICT firms. Together with GeSI, the organization has initiated the Conflict-Free Smelter Program (CFS) listing certified and conflict-free smelters. The program also provides standardized supplier communication letters, a dashboard tool and reporting templates [10].

The Global e-Sustainability Initiative (GeSI)

In collaboration with members from major Information and Communication Technology (ICT) companies and organizations around the globe, the Global e-Sustainability Initiative (GeSI) is a leading source of impartial information, resources and best practices for achieving integrated social and environmental sustainability through ICT [16].

Solutions for Hope

In July of 2011 the Solutions for Hope Project was announced by Motorola Solutions Inc. The 'Solutions for Hope Project' was launched as a pilot initiative to source conflict-free tantalum from the Democratic Republic of Congo (DRC). The Solutions for Hope Project's approach to mineral sourcing utilizes a closed-pipe supply line and a defined set of key suppliers – mines (including artisanal cooperatives), smelter/processor, component manufacturer and end user. The Project is open for all companies including mining, smelters, component manufacturers and product manufacturers (end-users) to join, and its success will be largely measured by the industry participation in the closed-pipe supply system.

RESOLVE's Solutions Network

The network mobilizes leaders in business and civil society to incubate and test ideas and turn them into self-sustaining environmental, social, and health solutions. The program builds solutions step-by-step, starting with more achievable projects, and then tackling challenges that are more complex. The Solutions Network is a voluntary, virtual network supported by RESOLVE collaborative experts and our technical and strategic partners [17]. In September of 2012, the Conflict-Free Tin Initiative was announced by Industry partners convened by the Dutch government. The Conflict-Free Tin Initiative project intends to start a conflict-free tin sourcing program in South Kivu, an eastern province of the Democratic Republic of Congo (DRC). The initiative pilots new tracking and tracing procedures to ensure the conflict-free status of the supply chain. Following the conflict-free testing phase of the pilot, the initiative will address other mine-site sustainability issues.

International Conference on the Great Lakes Region

International Conference on the Great Lakes Region is an intergovernmental organization of African countries in the African Great Lakes region that aims at facilitating the transboundary challenges of Central Africa. The Protocol against the Illegal Exploitation of Natural Resources (RINR) forms the core element of the 2006 Pact on Security, Stability and Development. Article 11 defines the implementation of a Regional Certification Mechanism (RCM). Structures and methods to conduct due diligence in the minerals sector are currently being developed on both, the ICGLR and member state levels. The RCM will eventually be integrated into national law of its member states [1, 18].

Bundesanstalt für Geowissenschaften und Rohstoffe

The Federal Institute for Geosciences and Natural Resources is the central geoscientific authority providing advice to the German Federal Government in all geo-relevant questions. It is subordinate to the Federal Ministry of Economics and Technology (BMWi). Commissioned by BMZ (German Federal Ministry for Cooperation and Development), the BGR supports the Secretariat of the ICGLR in setting up and implementing the Regional Certification Mechanism as part of the German Support Program to the ICGLR [1].

Enough

A Washington D.C. based NGO, Enough was launched in early 2007 as a project of the Center for American Progress. The Enough Project fights to end genocide and crimes against humanity, focused on areas where some of the world's worst atrocities occur. Enough conducts intensive field research in concerned countries, develops practical policies to address these crises, and shares sensible tools to help empower citizens and groups working for change. Enough works with citizens, advocates, and policy makers to prevent, mitigate, and resolve these crises [19].

World Gold Council

The World Gold Council has developed the Conflict-Free Gold Standard, an industry-led approach to combat the potential misuse of mined gold to fund armed conflict. The Standard has been developed with our member companies, comprising the world's leading gold producers, and with extensive input from governments, civil society and supply chain participants. It is an open standard that is available for use by any party involved in the extraction of gold [20].

The London Bullion Market Association

The LBMA supports the work of the OECD in the area of supply chain due diligence and has been actively involved in drafting the Gold Supplement section of the OECD Guidance. A number of members, both banks and refiners have contributed to this work and Ruth Crowell, the LBMA's Commercial Director, is the co-facilitator of the OECD Gold Guidance Drafting Committee and the LBMA's main contact for Responsible Gold [21].

