

**DEPARTMENT OF COMMERCE REPORTING REQUIREMENTS
UNDER SECTION 1502(d)(3)(C) OF THE DODD-FRANK ACT
WORLD-WIDE CONFLICT MINERAL PROCESSING FACILITIES**

As required by section 1502(d)(3)(C) of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), the Department of Commerce (Commerce) has compiled the attached list of all known conflict mineral processing facilities.

ITA Methodology

The Act defines “conflict minerals” to mean “columbite-tantalum (coltan), cassiterite, gold, wolframite, or their derivatives” or any other mineral determined by the Secretary of State to be financing conflict in the Democratic Republic of Congo or adjoining country. From a commercial standpoint, tin, tantalum, tungsten, and gold are the equivalent recoverable products to the minerals set forth in the statute and are more commonly used terms in commerce, and therefore these are the terms used in the listing.

The Commerce Department’s International Trade Administration (ITA) prepared this year’s report utilizing last year’s report as the starting point for this year’s submission. Following the release of the 2014 report, ITA was contacted regarding the contents and accuracy of the report. ITA requested that all recommended changes and edits to the 2014 smelter list be submitted in writing.

ITA contacted the U.S. Department of the Interior’s U.S. Geological Survey (USGS) to provide similar information on global conflict mineral processing facilities from their database. ITA used the information from last year’s ITA report and the USGS to create a list of processing facilities, including smelters and refiners, by accumulating, comparing, contrasting, and reconciling the information from the two sources of information. ITA performed no on-site verifications.

U.S. Geological Survey (USGS) Methodology

ITA relied primarily on data supplied by the Department of the Interior’s U.S. Geological Survey (USGS). The USGS is the only official U.S. Government source of information on nonfuel minerals, including conflict mineral reserves, production, and usage. Upon request by Commerce, USGS prepared a listing of tantalum, tin, tungsten, and gold (3TG) mineral processing facilities. ITA used the USGS list as the master list, adding to and deleting from the list based on information obtained from other non-USG sources.

The U.S. Geological Survey (USGS) prepared a listing of tantalum, tin, tungsten, and gold (3TG) mineral processing facilities, based upon a request by the U.S. Department of Commerce.

In developing its list of tantalum, tin and tungsten (3T) mineral processing facilities, USGS National Minerals Information Center specialists (commodity and country) sought to identify the critical processing step(s) or point at which ores and/or concentrates are transformed to a downstream product. Facilities identified as exclusively processing scrap or other secondary materials were excluded from the list supplied by the USGS. The facilities included in the

respective USGS 3T lists are thought to be appropriate critical-step processing facilities, with no consideration given to the actual source of their primary feed materials.

The list of gold refiners was limited to those facilities that produce refined gold that is deliverable to various local or international exchanges. Gold ores and concentrates at both commercial-scale and artisanal mines are most often processed to intermediate semi-refined forms of gold at or near the mine site. Thus, these gold refineries may be one or several steps removed from the direct source of ores and concentrates, and may be using these intermediate gold products, such as gold doré or precipitates, as well as scrap as their feed materials.

USGS specialists derived the information contained in these lists by analyzing historical records; monitoring periodic literature; reviewing company, country, and foreign government reports; reviewing commodity specific reports prepared by industry; and by gathering information from conferences, field trips, and industry and Government contacts. Many of these facilities have been discussed or tabulated in the text and structure tables of the U.S. Geological Survey's Minerals Yearbooks country and commodity chapters and in special papers.

The USGS compiled data were supplemented by facility tabulations prepared by companies and other organizations, such as the Electronic Industry Citizenship Coalition and the Organisation for Economic Co-operation and Development. Where identified, duplication of facilities reported under different names, was avoided. In the case of gold, most of the refineries identified were listed as having been certified to deliver gold by one or more of the global gold exchanges, as indicated. The tabulated facility lists prepared for ITA for each of the 3TG minerals were cross checked and reconciled by respective country and commodity specialists.

Limitations and Challenges

During Commerce's research of global smelters, certain hurdles to creating a list of all known processing facilities became clear. Primarily, there are artisanal miners that process small amounts of materials and are known to be employed in eastern Congo. Because these producers of metals are "off the grid," it is very difficult to trace exactly where these small amounts of materials are smelted.

There is also evidence of guerilla smelting operations throughout Africa that create makeshift smelters which produce an intermediary product of tantalum, tungsten and tin, and then ship the product overseas to scrap yards and informal metal traders and exchanges. The materials are often transshipped to another country and then flaked or shaved prior to being sent to a smelter.

Uniqueness

The attached list of all known processing facilities is the only consolidated catalog using the available resources of the United States Government. To the best of our knowledge, no other list of tantalum, tungsten, tin and gold smelters utilizes data from USGS. Furthermore, in the process of compiling this list, we observed that there continues to be a lack of publicly available information on processing facilities and that there are only a handful of smelter lists created by industry associations and private sector organizations, and publicly available in directories,

publications and related resources. Utilizing last year's report compared by ITA and cross referencing with the USGS lists, to our knowledge, the attached list is the most comprehensive list to date of all known processing facilities in the world. Any recommended changes, additions, or edits should be submitted in writing to the Commerce Department.