

**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 an 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 the more commonly used terms in commerce, and therefore these are the terms used in the listing.

In 2014, ITA reached out to a number of public and private sector stakeholders and collected conflict mineral processing facilities listings from the following organizations: 1) the U.S. Geological Survey¹, 2) the U.S. Government Accountability Office², 3) the Organization for Economic Co-operation and Development (OECD)³, 4) the London Bullion Market Association⁴, 5) the Electronic Industry Citizenship Coalition (EICC) and the related Global e-Sustainability Initiative (GeSI)⁵, 6) the Dubai Multi Commodities Centre (DMCC), and 7) the World Gold Council (WGC)⁶. ITA used this information to create its initial list of processing facilities, including smelters and refiners, by accumulating, comparing, contrasting, and reconciling the information from the seven sources of information. ITA then verified the existence of the facilities by utilizing a number of web-based information sources, including Lexis Diligence, Hoover’s, and Lexis-Nexis. However, no on-site verifications were performed.

Beginning in 2015, ITA has relied primarily on data supplied by the Department of the Interior’s U.S. Geological Survey (USGS) to produce this listing. The USGS methodology is detailed below. ITA uses the USGS list as the master list. ITA then verifies the existence of the facilities by utilizing a number of web-based information sources, including Lexis Diligence, Hoover’s, and Lexis-Nexis, adding to and deleting from the USGS master list based on information obtained from these non-USG sources, if applicable. Commerce made every effort to avoid

¹ In response to our request for assistance, the National Minerals Information Center of the United States Geological Survey transmitted its compiled global listings of processors (smelters, refiners, chemical plants, etc.) of gold, tantalum, tin, and tungsten ores and concentrates to the U.S. Department of Commerce in 2014 and 2015 and most recently on August 23, 2016.

² <http://www.gao.gov/assets/660/655972.pdf> (July 2013)

³ <http://www.oecd.org/daf/inv/mne/3TsmelterList.pdf> (Last Updated in November 2012)

⁴ <http://www.lbma.org.uk/the-good-delivery-list> (Last Updated in January 2014)

⁵ <http://www.conflictreesourcing.org/conflict-free-smelter-refiner-lists/> (Updated Regularly - Commerce Department analyzed list from March 2014).

⁶ http://www.dmcc.ae/DGD_GoldList.pdf (Updated December 2012)

duplicative listing of facilities reported under different names. No on-site verifications were performed.

U.S. Geological Survey (USGS) Methodology

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 has annually prepared this updated listing of tantalum, tin, tungsten, and gold (3TG) mineral concentrate processing facilities.

Tantalum, tin and tungsten (3T)

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 the point at which ores and/or concentrates are transformed into a downstream product. Facilities identified as exclusively processing scrap or other secondary materials were excluded from the lists supplied by the USGS. The facilities included in the respective 3T lists are thought to be appropriate critical-step processing facilities, with no consideration given to the actual source of their primary feed materials.

Gold

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 into intermediate semi-refined forms of gold at or near the mine site before being processed into deliverable form. Thus, the listed gold refineries may be one or several steps removed from the 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.

Data sources

USGS specialists have again 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 gathering information from conferences, field trips, and industry and Government contacts. USGS did incorporate input from EICC and OECD sources.

Many of these facilities have been discussed or tabulated in the text and structure tables of the annual USGS's Minerals Yearbooks, specifically in the country and commodity chapters, and in special papers. The tabulated facility lists prepared for ITA for each of the 3TG minerals were cross checked and reconciled by respective USGS country and commodity specialists. 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 in the list.

As explained above, ITA used a number of web-based information sources, including Lexis Diligence, Hoover's, and Lexis-Nexis, to verify the existence of the facilities on the USGS master list.

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.

Finally, we note that gold purchased through the Shanghai Gold Exchange (SGE), which accounts for an estimated 15-20 percent of all the gold used for commercial purposes, is comingled, and that the SGE does not release or keep records of where its gold is sourced. Therefore, any material that is purchased through the SGE is untraceable to a smelter, refiner, or processor of origin.

Uniqueness

The attached list of all known processing facilities is the only amalgamated 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 is a considerable 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. To our knowledge, the attached list is the most comprehensive annual listing of all known processing facilities in the world.