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 U.S. Department of Commerce (Commerce) has compiled the attached list of all known conflict mineral processing facilities worldwide.

International Trade Administration Methodology

The Commerce Department's International Trade Administration (ITA) is responsible for the preparation of this report and the information contained in the attached list, which is comprised of four sections, representing each of the conflict minerals. The Dodd-Frank Act defines "conflict minerals" to mean "columbite-tantalite (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, tantalum, tin, 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, manufacturing, and trade, and therefore are the terms used in the listing.

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. This listing of processing facilities can be utilized by private sector companies subject to Section 1502 of the Dodd-Frank Act to assist in developing a supply chain free of conflict minerals. The listing provides known processing facilities for companies and organizations to perform their own outreach and due diligence. It does not distinguish between processing facilities that are and are not conflict mineral-free. The USGS methodology is detailed below. In its efforts to develop a comprehensive smelter list that is reliable and accurate, ITA chose to use the USGS list as the master list.

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 prepared a 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 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 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. Many of these facilities have been discussed or tabulated in the text and structure tables of the 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.

Uniqueness

The attached list of all known conflict mineral processing facilities worldwide is the only consolidated catalog using the available resources of the United States Government. To the knowledge of ITA and USGS staff, no other list of tantalum, tin, tungsten, and gold smelters utilizes data from USGS. In the process of compiling this list, it was observed that there is a considerable lack of publicly available information on conflict mineral processing facilities and that there are only a handful of smelter lists created by industry associations, private sector organizations, and publicly available directories, publications, and related resources.

To our knowledge, the attached list is the most comprehensive annual listing of all known conflict mineral processing facilities in the world. Any recommended additions, deletions or other edits should be submitted in writing to the Commerce Department. Please direct your comments in writing to Gary Stanley, Director, Office of Materials Industries, International Trade Administration, Industry & Analysis, U.S. Department of Commerce, Washington, D.C. 20230 or via email gary.stanley@trade.gov.

Attachment 3: List of all known conflict mineral processing facilities worldwide

- Section 1: Identified global consumers of tantalum concentrates
- Section 2: Identified global consumers of tin concentrates (refineries and smelters)
- Section 3: Identified global consumers of tungsten concentrates
- Section 4: Identified global producers of gold bullion